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7

8 UNITED STATES BANKRUPTCY COURT  
9 CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION

10 In re  
11 NORTHERN HOLDING, LLC,  
12 Debtor.  
13  
14

Case No. 8:20-bk-13014-SC

Chapter 7

SECOND APPLICATION FOR  
ALLOWANCE OF FEES AND COSTS  
ON A FINAL BASIS FILED BY  
MARSHACK HAYS WOOD LLP AS  
GENERAL COUNSEL FOR TRUSTEE;  
MEMORANDUM OF POINTS AND  
AUTHORITIES; DECLARATION OF  
TINHO MANG IN SUPPORT

[TO BE HEARD WITH TRUSTEE'S  
FINAL REPORT]

17  
18 TO THE HONORABLE SCOTT C. CLARKSON, UNITED STATES BANKRUPTCY JUDGE,  
19 THE OFFICE OF THE UNITED STATES TRUSTEE, AND ALL INTERESTED PARTIES, ALL  
20 CREDITORS, AND/OR THEIR ATTORNEYS OF RECORD:

21 Marshack Hays Wood LLP ("Firm") respectfully submits this second and final application  
22 for allowance of fees and costs ("Application"). The Firm represents Richard A. Marshack, the duly  
23 appointed and acting chapter 7 trustee ("Trustee") for the bankruptcy estate ("Estate") of Northern  
24 Holding, LLC ("Debtor"), as the Estate's general counsel. By this Application, the Firm seeks  
25 allowance of \$127,546 in fees and \$10,868.55 for reimbursement of costs, pursuant to 11 U.S.C.  
26 §§ 330 and 331, and allowance of these and prior approved interim compensation on a final basis.  
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1 This Application encompasses services rendered and expenses paid or incurred from April 1,  
2 2022, through and including March 14, 2025 (“Reporting Period”).

3 The Firm’s first interim Application covered the period of June 15, 2021, through and  
4 including March 21, 2022 (“First Interim Reporting Period”). The First Application sought  
5 allowance of \$266,530 in professional fees and \$6,915.79 for reimbursement of expenses for the  
6 First Interim Reporting Period. On June 10, 2022, the Court entered an order granting the  
7 distribution (“First Interim Order”) to the Firm for total amount allowed of \$264,129 for interim  
8 fees, and \$6,915.79 of interim expenses.<sup>1</sup> Based on the First Interim Order, the Firm was paid  
9 interim fees of \$106,000 from specially reserved proceeds, and interim costs of \$6,915.79, leaving a  
10 remaining balance of \$165,044.79 in fees. Pursuant to the request in the declaration filed by Trustee  
11 on April 28, 2022, as Docket No. 325, Trustee was further authorized to pay Firm, as unencumbered  
12 or specifically designated funds become available, up to 70% of the remaining balance of allowed  
13 fees, to a maximum of \$115,531.35.

14 This second and final Application encompasses services rendered and expenses paid or  
15 incurred principally for the approximate three year period of April 1, 2022, through and including  
16 March 14, 2025 (“Second Reporting Period”), although some charges from the Interim Reporting  
17 Period which were left off the first interim application are also included. Under this second and final  
18 fee application, the Firm seeks allowance of \$127,546 in fees and \$10,868.55 in reimbursement of  
19 costs, for a total of \$138,414.55. Overall, the Firm seeks allowance of its total requested fees and  
20 costs in the amount of \$409,459.34, on a final basis, and for Court approval to pay all of the allowed  
21 fees and costs on a final basis, in connection with Trustee’s final report.

## 22 **1. Summary of Argument**

23 In this case, Trustee sold real property for \$9.1 million after hundreds of hours of work by  
24 himself (as trustee), his attorneys, and his real estate agents. Trustee has separately filed a motion  
25 seeking authorization to distribute funds held pending further order of the Court according to a  
26 partial subordination agreement between the Estate and AgWest Farm Credit f/k/a Farm Credit

27 \_\_\_\_\_  
28 <sup>1</sup> A true and correct copy of the First Interim Order is attached as **Exhibit 2**, to the declaration of  
Tinho Mang.

West, FCLA (“FCW”), the secured creditor against substantially all property of the Estate. Based on Trustee’s efforts, FCW was paid around \$8.3 million out of escrow, and the sale of the property to Riboli Paso Robles, LLC (“Buyer”) was made possible through the efforts of Trustee’s professionals including the Firm. In addition to the sale of the real property, Trustee was authorized to operate the Debtor’s pre-petition agricultural business for a limited period of time, which consisted primarily of the cultivation, harvest, and sale of grape crops from the properties. These operations were conducted with the assistance of Leroy Coddington, who was the Debtor’s managing member. Unfortunately, Trustee would discover that Mr. Coddington had illegally diverted the proceeds of these crops to himself. Most of the time and services incurred in this Reporting Period relate to the Trustee’s investigation and prosecution of a civil contempt proceeding against Mr. Coddington, who still has not turned over the misappropriated funds to the Estate. Trustee intends on filing a final report, although based on recent developments, the case may not yet be closed if Mr. Coddington finally makes good on his promise to repay the Estate.

## **2. Procedural Background – LBR 2016-1(A)(1)(A)**

### **A. Prepetition Matters**

Erich Russell was the former owner and operator of Rabbit Ridge Winery (“Rabbit Ridge”), which was as of October 2020 located at 1172 San Marcos Road, Paso Robles, CA (“San Marcos Property”). In addition to the San Marcos Property, Mr. Russell owned property commonly known as 2380 Live Oak Road, Paso Robles, CA (“Live Oak Property”), and certain land adjacent to the San Marcos Property commonly known as the “Texas Road Property” (collectively, the “Properties”). To finance his business operations, Mr. Russell borrowed substantial sums of money from Farm Credit West, FLCA (previously defined as “FCW”), which loans were secured certain assets including substantially all assets of Rabbit Ridge and the Properties.

On March 23, 2007, as document no. 2007-19418 in the County of San Luis Obispo, FCW recorded a deed of trust in the principal amount of \$17,500,000 against various properties owned by Erich Russell, including the San Marcos Property, adjacent farmland commonly known as the Texas

1 Road Property, and residential real property located at 2380 Live Oak Road, Paso Robles, CA (“Live  
2 Oak Property”).

3 Prior to a foreclosure of the Properties by FCW, Mr. Russell filed an individual Chapter 11  
4 case, initiating bankruptcy case number 9:20-bk-10035-DS (“Individual Case”). On June 19, 2020,  
5 the Individual Case was dismissed for cause.

6 A subsequent foreclosure sale for the Properties was scheduled by FCW for October 29,  
7 2020. Prior to the foreclosure date, Mr. Russell and FCW continued to discuss a possible forbearance  
8 and an extension of the foreclosure date.

9 On or about October 28, 2020, Mr. Russell signed quitclaim deeds transferring the Properties  
10 to Debtor. These quitclaim deeds were recorded on the same date. Additionally, ownership and  
11 control of Rabbit Ridge passed to Mr. Coddling.

## 12 **B. The Bankruptcy Proceedings**

13 On October 28, 2020 (“Petition Date”), Northern Holding, LLC, a Minnesota limited liability  
14 company (“Debtor”) filed a voluntary petition under Chapter 11 of Title 11 of the United States  
15 Code. Debtor’s managing member was Mr. Coddling.

16 On October 29, 2020, as Dk. No. 5, FCW filed a notice of continuation of perfection of  
17 security interest and demand to sequester cash collateral.

18 On November 6, 2020, as Dk. No. 11, FCW filed a motion for relief from the automatic stay  
19 regarding Live Oak Property and Debtor’s other two properties. In short, FCW has a blanket lien in  
20 the approximate amount of \$19-20 million over all assets of Debtor.

21 On March 18, 2021, a proof of claim was filed on behalf of the County of San Luis Obispo  
22 related to unpaid property taxes. Although the total amount of the filed secured claim was  
23 \$3,056,482.21, Trustee understands that the vast majority of the claimed property tax obligation is  
24 on account of the San Marcos Property, and any outstanding property taxes on the Live Oak  
25 Property are relatively minimal.

1 On June 15, 2021, the case was converted to Chapter 7. Richard A. Marshack was appointed  
2 as the Chapter 7 trustee. Immediately upon Trustee's appointment, he conducted an investigation of  
3 the Estate's assets both personally and through his professionals.

4 On July 16, 2021, as Dk. No. 138, the Trustee filed a motion to extend time to assume or  
5 reject executory contracts pursuant to 11 U.S.C. 365(a) ("Extend Motion"). On August 9, 2021, a  
6 hearing was held on the Extend Motion, and on August 10, 2021, as Dk. No. 188, the Court entered  
7 an order granting the Extend Motion.

8 On July 28, 2021, as Dk. No. 159, Trustee filed a notice of assets. The Court set a claims bar  
9 date of November 1, 2021 ("Bar Date"). By the Bar Date, only eight proofs of claim had been filed,  
10 and only one proof of claim was filed as a partial general unsecured claim – the claim by the  
11 Franchise Tax Board in the amount of \$10,297.92 (priority claim: \$3,529.47). Thus, the vast  
12 majority of the nearly \$30 million in claims are comprised of secured and administrative or priority  
13 unsecured claims.

14 On August 26, 2021, as Dk. No. 201, Trustee and FCW filed a stipulation providing for  
15 certain terms for relief from the automatic stay.

16 On September 7, 2021, as Dk. No. 210, the Court entered an order granting relief from stay  
17 to FCW pursuant to the stipulated terms agreed to by Trustee and FCW. Importantly, the stipulated  
18 terms provided that no enforcement action would be taken against the Live Oak Property before  
19 December 1, 2021 ("Enforcement Date"). Thus, Trustee had a short timeline under which he would  
20 be allowed to continue marketing the Live Oak Property (and other Estate properties) to sell.

21 **i. Farm Operator Agreement & Drilling Motion**

22 On August 9, 2021, as Dk. No. 186, Trustee filed a motion to approve a farm operator  
23 agreement and to authorize operations at the Properties for the limited purpose and scope of  
24 completing the Fall 2021 harvest with the assistance of a farm operator ("Operate Motion"). Mr.  
25 Codding was the designated farm operator.

26 The Operate Motion acknowledged that all grapes and crop on the Properties constituted  
27 FCW's collateral and any proceeds derived therefrom likely also constituted FCW's cash collateral.

1 After the filing of the Operate Motion, the Firm assisted the Trustee to negotiate with FCW for the  
2 use and distribution of its cash collateral, culminating in a stipulation between FCW and Trustee  
3 which was signed minutes before the hearing on the Operate Motion and the terms were verbally  
4 read into the record and incorporated into the Court's order.

5 On September 7, 2021, as Dk. No. 211, the Court entered an order approving the Operate  
6 Motion ("Operate Order"). Trustee collected around \$243,000 in proceeds and as explained below,  
7 an additional approximate \$140,000 was misappropriated by Mr. Coddington. When Mr. Coddington was  
8 unable to substantiate actual, necessary expenditures for operations to setoff his misappropriations,  
9 Trustee proceeded with litigation.

## 10 **ii. Contempt Motion**

11 On April 1, 2022, as Dk. No. 304, Trustee filed a motion for issuance of an order to show  
12 cause re: civil contempt against Mr. Coddington and his related entities ("OSC Motion").

13 On July 1, 2022, as Dk. No. 350, Mr. Coddington filed an opposition to the OSC Motion.

14 On October 26, 2022, as Dk. No. 359, the Court entered an order to show cause ("OSC").  
15 The OSC set discovery deadlines.

16 On December 8, 2022, as Dk. No. 365, Mr. Coddington's bankruptcy litigation attorneys filed a  
17 motion to withdraw as counsel.

18 On May 11, 2023, the Court conducted a hearing on an order to show cause re: civil  
19 contempt, and testimony of witnesses was presented both in person and over ZoomGov. At the  
20 conclusion of the hearing, Trustee and Coddington entered into stipulated terms to resolve the OSC,  
21 which were read into the record. The Court set a continued hearing date for June 15, 2023, at 11:00  
22 a.m.

23 On May 12, 2023, as Dk. No. 394, Trustee filed a stipulation signed by Coddington which  
24 memorialized and supplemented the terms read into the record ("Contempt Stipulation"). The  
25 Contempt Stipulation provided that Coddington would pay up to \$140,000 to the Estate by June 14,  
26 2023, or otherwise would agree to be adjudicated in contempt.

1 On May 16, 2023, as Dk. No. 397, FCW filed an objection to the Contempt Stipulation,  
2 regarding the treatment of the contempt sanctions. This objection was later resolved by stipulation.  
3 No funds were received by June 14, 2023.

4 On July 28, 2023, as Dk. No. 416, the parties filed a subsequent stipulation providing an  
5 increased payment of \$160,000 to be made by September 12, 2023, by Coddington, which stipulation  
6 was approved by an order of the Court entered as Docket No. 417. No funds were received by  
7 September 12, 2023.

8 On September 13, 2023, as Dk. No. 421, a further status report was filed where Coddington  
9 offered to pay an increased amount of \$170,000. However, no funds were received by the date of the  
10 continued hearing on September 27, 2023. At the hearing, the Court found that Coddington should be  
11 adjudicated in civil contempt, and set a continued hearing for October 18, 2023.

12 On October 5, 2023, as Dk. No. 424, the Court entered an order adjudicating Coddington in civil  
13 contempt ("Contempt Order"). The Contempt Order provided that the agreed amount of \$170,000  
14 must be paid by Coddington no later than October 7, 2023, at 11:50 p.m. Pacific Prevailing Time. No  
15 funds were received by October 7, 2023. At the hearing on October 18, 2023, the Court set a further  
16 continued hearing for November 8, 2023, based in part on Coddington's representation that he would  
17 obtain funds by October 31, 2023. No funds were received by October 31, 2023.

18 On November 6, 2023, as Dk. No. 430, Trustee filed a status report regarding Coddington's  
19 updated statement that he would obtain a cashier's check for \$170,000 by Friday, November 10,  
20 which was two days after the scheduled hearing. Based on Coddington's representation, the parties  
21 jointly requested that the hearing be continued for approximately one week. Based on the status  
22 report, the Court vacated the hearing on November 8, 2023, and set a further hearing on November  
23 16, 2023, at 11:00 a.m. No cashier's check was received by Trustee by November 10, 2023.

24 On November 14, 2023, as Dk. No. 434, Trustee filed a status report regarding Coddington's  
25 updated statement that he would obtain a cashier's check for \$175,000 by Friday, November 15,  
26 which was two days prior to the scheduled hearing. Based on Coddington's representation, the parties  
27 jointly requested that the hearing be continued for approximately one week. Based on the status  
28

1 report, the Court vacated the hearing on November 16, 2023, and set a further hearing on December  
2 6, 2023, at 11:00 a.m. Codding informed Trustee on December 4, 2023, that he had an attorney  
3 meeting on December 6, 2023, at 2:00 p.m. (i.e. three hours after the hearing), to assist with  
4 obtaining the loan. No funds received by Trustee by the continued hearing on December 6, 2023.  
5 The Court continued the hearing to January 9, 2024, at 11:00 a.m., with a status report due seven  
6 days in advance.

7 On January 2, 2024, as Docket No. 441, Trustee filed an updated status report with the Court.

8 At the hearing on January 9, 2024, the Court imposed additional sanctions of \$200 per day on  
9 Codding for his continuing failure to turn over and pay the monetary sanctions to Trustee, and, after  
10 hearing Trustee's concerns about Codding's obfuscation, also directed Codding to make the third  
11 parties available to communicate with Trustee.

12 On January 10, 2024, as Dk. No. 442, the Court entered an order providing for additional  
13 monetary sanctions of \$200 per day starting from January 9, 2024.

14 On January 19, 2024, as Dk. No. 444, Trustee submitted a further status report stating that  
15 based on Trustee's investigation, it appeared that Codding had made material misrepresentations to  
16 both the Court and the Trustee regarding his ability to obtain a loan secured by real property owned  
17 by his stepfather, Charles Munch. In summary, Trustee and his counsel spoke with the purported  
18 lender for Codding's loan, and the attorneys representing the trustees of the Charles Munch family  
19 trusts, and was informed that Codding had never told the trust attorneys that he intended on  
20 obtaining a portion of the proceeds from a loan which was intended for the benefit of Charles  
21 Munch. Based on this conversation, Trustee believed that Codding had made material  
22 misrepresentations to the Court.

23 On January 26, 2024, as Dk. No. 446, Trustee filed, as a courtesy to Codding, certain  
24 documents that he requested to be filed in response to Trustee's allegations of misrepresentations.

25 On February 1, 2024, as Dk. No. 447, the Court entered an order continuing the status  
26 conference to February 27, 2024, and suspending the additional monetary sanctions of \$200 per day.



1 On February 20, 2024, as Dk. No. 451, Trustee submitted a further status report stating that  
2 based on Trustee's investigation, it appeared that Coddington may have made material  
3 misrepresentations to the Court regarding the loan. On February 20, 2024, as Dk. No. 452, Trustee  
4 filed, as a courtesy to Coddington, certain documents that he requested to be filed in response to  
5 Trustee's allegations of misrepresentations.

6 On April 2, 2024, as Dk. No. 467, the Court entered an order re further adjudication of civil  
7 contempt ("April 2 Order"). The April 2 Order included a body detention order for Mr. Coddington as  
8 he failed to appear as ordered and promised, to be enforced by the United States Marshals Service  
9 ("Marshals").

10 On April 11, 2024, as Dk. No. 470, the Court entered an order modifying the April 2 Order  
11 and Setting Continued Status Conference on Contempt.

12 On May 28, 2024, as Dk. No. 475, the Court entered an order continuing the status  
13 conference to July 2, 2024.

14 On August 16, 2024, as Dk. No. 480, the Court entered an order continuing the status  
15 conference to September 10, 2024.

16 On September 10, 2024, as Dk. No. 483, the Court continued the status conference to  
17 November 12, 2024 at 11:00 a.m.

18 On November 8, 2024, as Dk. No. 485, the Court entered an order continuing the status  
19 conference to February 18, 2025.

20 The hearing on February 18, 2025 was continued without appearance by Mr. Coddington. On  
21 March 7, 2025, the Marshals apprehended Mr. Coddington in Orange, California, and a hearing was  
22 held on March 11, 2025, where Mr. Coddington appeared in the custody of the Marshals.

23 On March 11, 2025, as Dk. No. 495, the Court entered an order directing the Marshals to  
24 release Mr. Coddington as discussed on the record ("Release Order"), and imposing additional  
25 monetary sanctions of \$20,000. In total, Mr. Coddington has been ordered to pay \$194,600 in monetary  
26 sanctions, of which he has paid nothing.

1                   **iii.     Cash Disbursement Motion**

2           After closing the sale of the Live Oak Property, Trustee made distributions of over \$8 million  
3 to creditors and held the remainder of certain funds in reserve pursuant to an agreement with secured  
4 creditor, Farm Credit West, FCLA (“FCW”). FCW has already agreed in writing to the payment of  
5 certain items from the monies being held in the Estate’s bank account including significant  
6 administrative fee reserves. On April 6, 2022, as Dk. No. 309, Trustee filed a motion seeking entry  
7 of an order authorizing interim distributions from these administrative reserves to administrative  
8 creditors including interim compensation to Trustee and his retained professionals (“Distribution  
9 Motion”). Through the Motion, Trustee sought only a partial payment of the accrued and owed  
10 administrative expenses from the specifically subordinated and segregated administrative expense  
11 reserve set up pursuant to the “carve-out” agreement with FCW and approved by the Court. On May  
12 10, 2022, as Dk. No. 332, the Court entered an order granting the Distribution Motion.

13           Trustee also entered into a stipulation with N.Rex Awalt Corp. dba Aqua Engineering, a  
14 water well related contractor, who had performed work at the Properties at the request of Mr.  
15 Codding but was not paid for its work. The stipulation provided for partial payment to the claimant.

16                   **iv.     9019 Motion with Farm Laborers**

17           As discussed above, Trustee was authorized by the Court to temporarily operate property of  
18 the Estate to complete a harvest of grapes, and all expenses were required to be paid by Trustee’s  
19 farm operator Lee Codding. Instead of paying farming expenses, Codding apparently hired and  
20 refused to pay farm laborers, and also misappropriated at least \$140,000 of crop proceeds, which are  
21 the subject of a separate civil contempt proceeding.

22           Specifically, Mr. Codding contracted with three related companies, SoMoCo Labor Supply,  
23 Inc., Emerald Valley Labor, and Azcona Harvesting, LLC (“Labor Suppliers”). The terms of labor  
24 were negotiated between Mr. Codding and the Labor Suppliers, where the Labor Suppliers would  
25 hire and compensate the actual workers, and would then receive payment from the property owner,  
26 plus arbitrage. The principal for the Labor Suppliers appeared at the evidentiary hearing on the OSC  
27 and testified at length about the circumstances under which the Labor Suppliers were left unpaid by  
28

Mr. Coddington. Rather than litigate over the allowance of the Labor Suppliers' claims, Trustee and the Labor Suppliers subsequently negotiated an agreement where the Labor Suppliers would receive 70% of the invoiced charges in full satisfaction of the Estate's liability for such unpaid services. Accordingly, on November 9, 2023, as Dk. No. 432, the Trustee filed a Motion to Approve the Compromise with the farm laborers ("9019 Motion"). On December 5, 2023, as Dk. No. 437, the Court entered an order granting the 9019 Motion.

**3. Status of Administration– LBR 2016-1(a)(1)(A)(ii)**

All assets of the Estate have been administered, *except that* Mr. Coddington remains under an order of coercive civil contempt requiring him to reimburse the Estate for the property of the Estate that he misappropriated, plus additional monetary sanctions. Mr. Coddington has not yet paid anything to the Trustee to date.

**A. Funds on Hand in the Estate – LBR 2016-1(a)(1)(A)(iii)**

Funds on hand are subject to the secured claim of FCW, as modified by agreement, including the stipulation for voluntary subordination of lien attached as Exhibit "1" ("Subordination Stipulation") to the motion filed on December 20, 2021, as Docket No. 264. Additionally, proceeds of the sale of grape crops are subject to the stipulated terms of the use of cash collateral as set forth on the record and memorialized in the order granting the Trustee's motion to operate, which order was entered on September 7, 2021, as Docket No. 211 ("Operate Order").

As of the filing of this Application, the Estate has \$147,310.65 on hand, which is segregated as follows:

- \$24,454 in general checking account funds
- \$852.23 remaining of the reserve for payment of the field agent's fees and expenses pursuant to paragraph 2.q. of the Subordination Stipulation.
- \$15,000 for payment of insurance pursuant to paragraph 2.c. of the Subordination Stipulation.
- \$107,004.34, constituting the remainder of the proceeds of grape sales from Trustee's prior collections.

1 Additionally, the Estate continues to accrue the cost of monitoring and waiting for Mr.  
2 Coddington's compliance with his Court-ordered reimbursement and sanctions payment obligations.  
3 Collectively, Mr. Coddington owes \$194,600 in monetary sanctions.

4 **B. Employment of the Firm – LBR 2016-1(a)(1)(B)**

5 On July 15, 2021, as Dk. No. 136, Trustee filed an application to employ Marshack  
6 Hays LLP as general counsel ("Employment Application"). On August 11, 2021, as Dk. No. 190, the  
7 Court entered an order granting the Employment Application ("Employment Order"). A true and  
8 correct copy of the Employment Order is attached to the Declaration of Tinho Mang ("Mang  
9 Declaration") as **Exhibit 1**.

10 **C. Previous Fees and Expenses – LBR 2016-1(a)(1)(C)**

11 The Firm's first interim Application covered the period of June 15, 2021, through and  
12 including March 21, 2022. The original amount of fees and costs requested by the Firm totaled  
13 \$273,445.79. On June 10, 2022, as Dk. No. 339, the Court entered an order granting the distribution  
14 to the Firm for total amount allowed of \$264,129 for interim fees, and \$6,915.79 of interim  
15 expenses.

16 The Firm has received interim payments on account of its allowed fees in the amount of  
17 \$221,531 in fees and \$6,915.79 in expenses, leaving an unpaid balance of \$42,598 under the first  
18 interim fee application.

19 **D. Description of Services Rendered – LBR 2016-1(a)(1)(d)**

20 During that approximately 4 year duration of this case, and for the services set forth in this  
21 application, the Firm provided 325.50 hours of services to the Estate. The Firm's blended hourly rate  
22 for all services provided to the Estate as set forth in this Application is \$392. Descriptions of the  
23 types of services rendered by the Firm are set forth below pursuant to the categories recommended  
24 by the Office of the United States Trustee, and custom categories created by the Firm to assist with  
25 segregating time by project.

26 **i. SLO Property Tax negotiations**

27 The Firm spent .60 hours on a special custom category for SLO Property Tax negotiations,  
28

1 resulting in fees of \$314, which is less than 1% of the total fees sought by the Application. The  
2 blended hourly rate for these services is approximately \$X. Services performed in this category are  
3 detailed in **Exhibit 3** attached to the Mang Declaration.

4 Specifically, the fees accrued in this custom subcategory relate to the Trustee's investigation  
5 of potentially using the Trustee's powers to reduce or renegotiate the secured property taxes of over  
6 \$3 million owed to San Luis Obispo County as a result of the nonpayment of a long period of  
7 property taxes for the San Marcos Property. For this analysis, FCW stipulated to permit a further  
8 budget of \$6,000 to the Estate, which was memorialized in a stipulation filed as Docket No. 284.  
9 The Firm provided the analysis and no further action was requested by FCW.

## 10 **ii. Contempt Proceedings**

11 The Firm spent 243.10 hours on a special custom category for Contempt Proceedings,  
12 resulting in fees of \$102,473, which is 80% of the total fees sought by the Application. The blended  
13 hourly rate for these services is approximately \$409. Services performed in this category are detailed  
14 in **Exhibit 3** attached to the Mang Declaration.

15 The majority of time spent on this case after the close of the sale of the Live Oak Property  
16 related to the Trustee's investigation of Mr. Coddington's misappropriation of funds and ultimately the  
17 preparation and prosecution of a civil contempt proceeding against Mr. Coddington, which resulted in  
18 civil contempt sanctions of \$194,600 to date (none of which has been paid by Mr. Coddington). The  
19 fees accrued to obtain this civil contempt award are less than 50% of the award, and were necessary  
20 to ensure that Mr. Coddington was subjected to all necessary and coercive orders to reimburse the  
21 Estate. Indeed, it appears possible that Mr. Coddington violated federal law under either 18 U.S.C.  
22 § 152 or 153, and the Firm assisted the Trustee to uncover what had happened and develop the  
23 factual record to attempt to rectify the damage to the Estate. The fees in this subcategory begin from  
24 the Trustee's preparation of the OSC Motion and continue through all attempts to enforce the  
25 contempt order to date, including preparation for and participating in an evidentiary hearing that  
26  
27  
28

1 included thousands of pages of documents (many of which consisted of Mr. Coddington's financial  
2 records and communications which were placed into the record).

3 **iii. Asset Analysis and Recovery**

4 The Firm spent 1.10 hours on Asset Analysis and Recovery, resulting in fees of \$403, which  
5 is less than 1% of the total fees sought by the Application. The blended hourly rate for these services  
6 is approximately \$366. Services performed in this category are detailed in **Exhibit 3** attached to the  
7 Mang Declaration.

8 Minimal fees in this subcategory were expended during the Reporting Period.

9 **iv. Litigation**

10 The Firm spent 11.20 hours on Litigation, resulting in fees of \$4,574, which is 4% of the  
11 total fees sought by the Application. The blended hourly rate for these services is approximately  
12 \$408. Services performed in this category are detailed in **Exhibit 3** attached to the Mang  
13 Declaration.

14 Services in this category include miscellaneous litigation activities which were not adverse  
15 actions against Mr. Coddington, including settlement negotiations with FCW and other third parties.

16 **v. Asset Disposition**

17 The Firm spent 10.50 hours on Asset Disposition, resulting in fees of \$4,173, which is 3% of  
18 the total fees sought by the Application. The blended hourly rate for these services is approximately  
19 \$397. Services performed in this category are detailed in **Exhibit 3** attached to the Mang  
20 Declaration.

21 Services in this category relate to the disposition of collateral and proceeds, and a failed offer  
22 to purchase the San Marcos Property from Mr. Coddington, which never made it past a vague term  
23 sheet phase.

24 **vi. Business Operations**

25 The Firm spent 18.30 hours on Business Operations, resulting in fees of \$7,567, which is 6%  
26 of the total fees sought by the Application. The blended hourly rate for these services is  
27 approximately \$ 413. Services performed in this category are detailed in **Exhibit 3** attached to the  
28

1 Mang Declaration.

2 Services in this category include assisting the Trustee with legal work related to the farming  
3 operations and determining and paying farming expenses. Trustee and the Firm contend that all fees  
4 incurred in this section are payable from crop proceeds pursuant to paragraph 6.b.ii. of the Operate  
5 Order.

6 **vii. Case Administration**

7 The Firm spent 6.30 hours on Case Administration, resulting in fees of \$1,385, which is 1%  
8 of the total fees sought by the Application. The blended hourly rate for these services is  
9 approximately 220. Services performed in this category are detailed in **Exhibit 3** attached to the  
10 Mang Declaration.

11 Services in this category include miscellaneous compliance and reporting issues. Minimal  
12 time was charged in this category during the Reporting Period.

13 **viii. Claims Administration and Objections**

14 The Firm spent 7.30 hours on Claims Administration and Objections, resulting in fees of  
15 \$3,043, which is 2% of the total fees sought by the Application. The blended hourly rate for these  
16 services is approximately \$417. Services performed in this category are detailed in **Exhibit 3**  
17 attached to the Mang Declaration.

18 Services in this category include assisting the Trustee with miscellaneous claim issues,  
19 including the preliminary drafting of an objection to the papers submitted by the Labor Suppliers  
20 which Trustee, in an abundance of caution, was prepared to treat as an informal proof of claim under  
21 *Spokane Law Enforcement Federal Credit Union v. Barker (In re Barker)*, 839 F.3d 1189, 1196 (9th  
22 Cir. 2016). Ultimately, the matter settled without the need for a claim objection to be determined by  
23 the Court, after cooler heads prevailed.

24 **ix. Fee/Employment Applications**

25 The Firm spent 18.80 hours on Employment and Fee Applications, resulting in fees of  
26 \$3,614, which is 3% of the total fees sought by the Application. The blended hourly rate for these  
27 services is approximately \$192. Services performed in this category are detailed in **Exhibit 3**  
28

1 attached to the Mang Declaration.

2 Services in this category relate to the preparation of the Firm's fee applications. The fees  
3 charged in this category are compensable under *Baker Botts LLP v. ASARCO LLC*, 576 U.S. 121,  
4 132-33 (2015) (reasonable fees for preparation of fee application are compensable).

5 **x. Fee/Employment Objections**

6 The Firm spent 1.0 hours on Employment and Fee Objections, all of which was not charged  
7 by the Firm. Services performed in this category are detailed in **Exhibit 2** attached to the Mang  
8 Declaration.

9 The Firm recognizes that no fees are permitted for "defending a fee application" pursuant to  
10 *Baker Botts*, 576 U.S. at 134-35, and separately tracked but no-charged all time related to resolving  
11 fee objections.

12 **E. Detailed Statement of Services Performed – LBR 2016-1(a)(1)(E)**

13 Attached to the Mang Decl. as **Exhibit 3** is a photocopy reduction of the Firm's computer  
14 billing printout and consists of the summation of the Firm's time records as kept in the ordinary  
15 course of business during the Reporting Period. The detail set forth in **Exhibit 4** is believed by the  
16 Firm to be sufficient to demonstrate the services performed by the Firm during the period covered  
17 by this Application. Attached to the Mang Decl. as **Exhibit 4** is a summary schedule of the fees  
18 requested as recommended in the U.S. Trustee Guidelines.

19 The persons who rendered services in connection with the Firm's representation of the Estate  
20 are identified in the billing detail by their initials. Those persons are:

21

DEH	D. Edward Hays
DAW	David A. Wood
KAT	Kristine A. Thagard
CVH	Chad V. Haes
TM	Tinho Mang
BNB	Bradford N. Barnhardt
PK	Pamela Kraus
CM	Chanel Mendoza
LB	Layla Buchanan
CB	Cynthia Bastida

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1 There have been intra-office conferences billed by attorneys and paralegals. The Firm  
2 believes that, at times, intra-office conferencing is a necessary part of its ability to efficiently and  
3 effectively represent the Trustee by assembling a “team” of lawyers to work on the case. This team  
4 consists of a supervising partner or senior attorney, an associate, and a paralegal. As a part of this  
5 team approach to representing the Trustee, the supervising attorney analyzes the needs of the client  
6 and assigns to the associates or paralegal tasks based upon the level of expertise and experience  
7 needed to complete the task. A key to the team concept is communication among the members of the  
8 team. While it may not be necessary for all team members to be aware of all of the intricacies of the  
9 case, the supervising partner must be informed of all aspects of the case. Moreover, from time to  
10 time, it is essential for the partner supervising the case to provide to junior members of the team  
11 advice on matters which arise in the course of the representation of the Trustee.

12 **F. Detailed Statement of Costs Incurred – LBR 2016-1(a)(1)(F)**

13 Pursuant to LBR 2016-1(a)(1)(F), “an application that seeks reimbursement of actual and  
14 necessary expenses must include a summary listing of all expenses by category (*i.e.*, long distance  
15 telephone, photocopy costs, facsimile charges, travel, messenger and computer research). As to each  
16 unusual or costly expense item, the application must state: (i) the date the expense was incurred; (ii) a  
17 description of the expense; (iii) the amount of the expense; and (iv) an explanation of the expense.”

18 Attached to the Mang Declaration as **Exhibit 5** is a schedule of costs and expenses incurred  
19 or paid by the Firm during the relevant time period but not yet reimbursed. Attached to the Mang  
20 Declaration as **Exhibit 6** is a summary schedule of costs, as recommended in the U.S. Trustee  
21 Guidelines. The Firm believes and represents that the costs and expenses are reasonable under the  
22 circumstances of this case and the various pleadings filed by the Firm on behalf of the Trustee.

23 During the Reporting Period, the Firm incurred expenses of \$10,868.55. These expenses  
24 were actual expenses incurred in connection with the services rendered on behalf of the Estate.  
25 Expenses of this type are billed to and paid by the Firm’s clients who pay monthly without  
26 contingency as to payment. The Firm has not included such expenses in its overhead and such  
27 expenses are not encompassed by its billing rates.

28

**G. Hourly Rates – LBR 2016-1(a)(1)(G)**

Pursuant to LBR 2016-1(a)(1)(G), “unless employment has been approved on a fixed fee, percentage fee, or contingent fee basis, the application must contain a listing of the hourly rates charged by each person whose services form a basis for the fees requested in the application. The application must contain a summary indicating for each attorney by name: (i) The hourly rate and the periods each rate was in effect; (ii) The total hours in the application for which compensation is sought; and (iii) The total fee requested in the application.”

<u>Timekeeper</u>	<u>Rate/Period</u>	<u>Total Hours</u>	<u>Total Fees</u>
D. Edward Hays	04/01/2022 to 02/29/2023		
	\$680	7.7	5,236.00
	NC	0.2	0.00
	04/01/2023 to 03/31/2024		
	\$690	8.8	6,072.00
	NC	2.1	0.00
	04/01/2024 to 12/31/2024		
	\$740	3.7	2,738.00
	NC	0.0	0.00
David A. Wood	04/01/2022 to 02/29/2023		
	\$490	0.5	245.00
	NC	1.0	0.00
Kristine A. Thagard	03/24/2022 to 04/30/2022		
	\$550	1.0	550.00
	NC	0.0	0.00
Chad V. Haes	05/01/2022 to 10/31/2022		
	\$490	0.0	0.00
	NC	0.5	0.00
Tinho Mang	04/01/2022 to 03/31/2023		
	\$390	122.1	47,619.00
	NC	4.6	0.00
	04/01/2023 to 03/31/2024		
	\$430	108.8	46,784.00
	NC	1.5	0.00
	04/01/2024 to 03/14/2025		
	\$500	16.3	8,150.00
Bradford N. Barnhardt			
	NC	7.1	0.00
	05/01/2023 to 05/31/2023		
	\$360	0.0	0.00
	NC	0.3	0.00
	01/01/2024 to 03/31/2024		

		\$410	0.0	0.00
		NC	0.7	0.00
Pamela Kraus	02/01/2023 to 02/28/2023			
	\$260	0.0	0.00	
	NC	0.4	0.00	
	02/01/2024 to 02/28/2024			
	\$290	0.0	0.00	
	NC	0.3	0.00	
	02/01/2025 to 02/28/2025			
	\$340	0.0	0.00	
	NC	0.6	0.00	
Chanel Mendoza	10/01/2022 to 01/3/2024			
	\$290	1.8	522.00	
	NC	0.2	0.00	
	04/01/2024 to 04/30/2024			
	\$340	0.4	136.00	
	NC	0.3	0.00	
Layla Buchanan	04/01/2022 to 03/31/2023			
	\$260	19.8	5,148.00	
	NC	0.3	0.00	
	04/01/2023 to 03/31/2024			
	\$290	10.4	3,016.00	
	NC	0.1	0.00	
	04/01/2024 to 03/14/2025			
	\$340	3.4	1,156.00	
	NC	0.0	0.00	
Cynthia Bastida	09/01/2023 to 09/30/2023			
	\$290	0.6	174.00	
	NC	0.0	0.00	
<b>Totals:</b>		<b>325.5</b>	<b>127,546.00</b>	

## H. Professional Education and Experience – LBR 2016-1(a)(1)(H)

Pursuant to LBR 2016-1(a)(1)(H), the Application must include “a description of the professional education and experience of each of the individuals rendering services, including identification of the professional school attended, year of graduation, year admitted to practice, publications or other achievements, and explanation of any specialized background or expertise in bankruptcy-related matters.”

A brief biographical description of the attorneys who rendered services for which

1 compensation is sought by this Application is attached to the Mang Decl. as **Exhibit 7**. The Firm  
2 believes and represents that the services rendered during the Reporting Period have been beneficial  
3 to the Estate and that this request for allowance of compensation is fair and reasonable.

4 **I. Change in Professional Rates – LBR 2016-1(a)(1)(I)**

5 Pursuant to LBR 2016-1(a)(1)(I), “if the hourly rate has changed during the period covered  
6 by the application, the application must specify the rate that applies to the particular hours for which  
7 compensation is sought.”

8 The rate changes and the rate that applies for the particular hours are set forth in Section G  
9 above.

10 **4. Legal Argument**

11 **A. Amount of Current Request for Compensation and Reimbursement**

12 As set forth above and in the exhibits attached to the Mang Decl., during the Reporting  
13 Period the Firm incurred fees in the amount of \$127,546. The Firm incurred expenses in the amount  
14 of \$10,868.55 on behalf of the Trustee, for which the Firm requests Court approval.

15 The Firm was allowed interim fees of \$264,129<sup>2</sup>, and interim expenses of \$6,915.79. The  
16 Firm was paid \$106,000 in interim fees, and \$6,915.79 in interim expenses, leaving a remaining  
17 balance of \$165,044.79 in fees. Pursuant to the request in the declaration filed by Trustee on April  
18 28, 2022, as Docket No. 325, Trustee was further authorized to pay Firm, as unencumbered or  
19 specifically designated funds become available, up to 70% of the remaining balance of allowed fees,  
20 to a maximum of \$115,531.35. The Firm requests approval of its fees and costs all on a final basis,  
21 and payment for all allowed fees and costs on a final basis from funds which constitute the  
22 unencumbered property of the Estate, and consistent with consent from FCW for the use of any of its  
23 cash collateral.

24 **B. Legal Points and Authorities**

25 The Bankruptcy Code provides that the Court can authorize payment of reasonable and  
26 necessary compensation and reimbursement of expenses:

27 \_\_\_\_\_  
28 <sup>2</sup> Per Order entered June 10, 2022, as Dk. No. 339, \$106,000 was authorized for payment.

1 “(a) (1) After notice to the parties in interest and the United States  
2 Trustee and a hearing, and subject to sections 326, 328, and 329, the  
3 court may award to a trustee, an examiner, a professional person  
4 employed under section 327 or 1103- (A) reasonable compensation for  
5 actual, necessary services rendered by the trustee, examiner,  
6 professional person, or attorney and by any paraprofessional person  
7 employed by any such person; and  
8 (B) reimbursement for actual, necessary expenses.”

9 11 U.S.C. § 330.

10 “A compensation award based on a reasonable hourly rate multiplied by the number of hours  
11 actually and reasonably expended is presumptively a reasonable fee.” *In re Manoa Finance Co.*, 853  
12 F.2d 687, 691 (9th Cir. 1988); *see, e.g., Sundquist v. Bank of America, N.A. (In re Sundquist)*, 576  
13 B.R. 858, 876-77 (Bankr. E.D. Cal. 2017). “The primary method used to determine a reasonable  
14 attorney fee in a bankruptcy case is to multiply the number of hours expended by an hourly rate.” *In*  
15 *re Yermakov*, 718 F.2d 1465, 1471 (9th Cir. 1983). This lodestar or basic fee, if warranted, can then  
16 be adjusted upward or downward. *In re Powerine Oil Co.*, 71 B.R. 767 (B.A.P. 9th Cir. 1986).

17 Services which were not “reasonably likely to benefit the estate” or were not “necessary to  
18 the administration of the case” are not compensable. 11 U.S.C. § 330(a)(4). In considering a fee  
19 award, the court must consider “whether the services were necessary to the administration of, or  
20 beneficial at the time at which the service was rendered toward the completion of, a case.”

21 11 U.S.C. § 330(a)(3)(C) (emphasis added); *Roberts, Sheridan & Kotel, P.C. v. Bergen Brunswig*  
22 *Drug Co. (In re Mednet)*, 251 B.R. 103, 108 (9th Cir. BAP 2000) (“...the applicant must  
23 demonstrate only that the services were ‘reasonably likely’ to benefit the estate at the time the  
24 services were rendered.”); *see, e.g., Mohsen v. Wu (In re Mohsen)*, 506 B.R. 96, 106-10 (N.D. Cal.  
25 2013).

26 Based upon the foregoing points and authorities and the declarations and the attached  
27 exhibits, the Firm believes that the fees and costs requested are reasonable given the benefit  
28 conferred on the Estate’s creditors.

///

///

1 **5. Conclusion**

2 The Firm requests that this Court enter its Order as follows:

- 3 1. Approving and allowing on a *final basis* the amount of \$264,129 in fees previously  
4 awarded on an interim basis via the First Application Order;
- 5 2. Approving and on a *final* basis the amount of \$6,915.79 in costs previously awarded  
6 on an interim basis via the First Application Order;
- 7 3. Approving the Firm's fees as requested in this application in the amount of \$127,546  
8 on a final basis;
- 9 4. Approving the Firm's costs in this application in the amount of \$10,868.55 on a final  
10 basis;
- 11 5. Authorizing the Trustee to pay all of the Firm's allowed fees and reimbursement of  
12 costs as administrative expenses in connection with the Trustee's final report or other order of the  
13 Court; and
- 14 6. For any other and further relief that the Court deems proper.

15 DATED: March 20, 2025

MARSHACK HAYS LLP

/s/ Tinho Mang

By: \_\_\_\_\_

D. EDWARD HAYS

DAVID A. WOOD

TINHO MANG

Applicant and Attorneys for Chapter 7 Trustee,  
RICHARD A. MARSHACK

## Declaration of Tinhong Mang

I, TINHONG MANG, say and declare as follows:

1. I am an individual over 18 years of age and competent to make this declaration.
2. If called upon to do so, I could and would competently testify as to the facts set forth in this Declaration. The facts set forth below are true of my personal knowledge.
3. I am an associate attorney at the law firm of Marshack Hays Wood LLP f/k/a Marshack Hays LLP, attorneys for Richard A. Marshack, the Chapter 7 Trustee ("Trustee") for the Bankruptcy Estate ("Estate") of Northern Holding, LLC ("Debtor") and maintain offices at 870 Roosevelt, Irvine, California, 92620. With the consent of the supervising attorneys at the Firm, I am the designated person responsible for the billing in this case.
4. Unless otherwise stated, the facts set forth in this declaration are personally known to me and if called as a witness, I could and would competently testify thereto.
5. All terms not otherwise defined herein are used as they are defined in the Motion.
6. I make this declaration in support of the Firm's Second and Final Application for Allowance of Fees and Costs ("Application"). All terms not otherwise defined herein are used as they are defined in the Application.
7. This Application encompasses services rendered and expenses paid or incurred during the approximate three year period from April 1, 2022, through and including March 14, 2025 ("Second Reporting Period").
8. The Firm's first interim Application covered the period of June 15, 2021, through and including March 21, 2022. The original amount of fees and costs requested by the Firm totaled \$273,445.79. On June 10, 2022, as Dk. No. 339, the Court entered an order granting the distribution to the Firm for total amount allowed of \$264,129 for interim fees, and \$6,915.79 of interim expenses ("First Fee Order").
9. With the exception of the general sharing of compensation between members and employees of the Firm, no agreement or understanding exists between the Firm and any other

1 individual or entity for the sharing of compensation to be received for services rendered or the  
2 reimbursement of costs incurred in or in connection with this case.

3 10. On October 28, 2020 (“Petition Date”), Northern Holding, LLC, a Minnesota limited  
4 liability company (“Debtor”) filed a voluntary petition under Chapter 11 of Title 11 of the United  
5 States Code. Debtor’s managing member was Leroy E. Coddington IV (“Mr. Coddington”).

6 11. On June 15, 2021, the case was converted to Chapter 7. Richard A. Marshack was  
7 appointed as the Chapter 7 trustee.

8 12. On July 15, 2021, as Dk. No. 136, Trustee filed an application to employ Marshack  
9 Hays LLP as general counsel (“Employment Application”). On August 11, 2021, as Dk. No. 190, the  
10 Court entered an order granting the Employment Application (“Employment Order”).

11 13. A true and correct copy of the Employment Order is attached as **Exhibit 1**.

12 14. A true and correct copy of the First Fee Order is attached as **Exhibit 2**.

13 15. A true and correct copy of the schedule of fees requested by the Firm during the  
14 relevant time period is attached to this declaration as **Exhibit 3**.

15 16. A true and correct copy of the summary schedule of fees as recommended by the  
16 U.S. Trustee Guidelines is attached to this declaration as **Exhibit 4**.

17 17. A true and correct copy of the schedule of costs and expenses incurred or paid by the  
18 Firm during the relevant time period is attached to this declaration as **Exhibit 5**.

19 18. A true and correct copy of the summary schedule of costs as recommended by the  
20 U.S. Trustee Guidelines is attached to this declaration as **Exhibit 6**.

21 19. A true and correct copy of the Firm’s resume, containing a brief biographical  
22 description of the attorneys who rendered services for which compensation is sought by this  
23 Application, is attached to this declaration as **Exhibit 7**.

24 20. I have reviewed this Application, the attached billing records, and the attached  
25 records of costs in detail, and I believe that this Application complies with the provisions of  
26 LBR 2016-1.



1           21.     The Firm requests that the Court enter an order allowing all of the Firm's incurred  
2 fees and costs for the Second Reporting Period (\$127,546 in fees and \$10,868.55 in costs, a total of  
3 \$138,414.55).

4           22.     The Firm's services provided value and benefit to the Estate and should be approved  
5 as reasonable.

6  
7                     I declare under penalty of perjury that the foregoing is true and correct. Executed on  
8 March 20, 2025.

9                                     /s/ Tinh Mang  
10                                    TINHO MANG

**EXHIBIT 1**

1 D. EDWARD HAYS, #162507  
ehays@marshackhays.com  
2 DAVID A. WOOD, #272406  
dwood@marshackhays.com  
3 TINHO MANG, #322146  
tmang@marshackhays.com  
4 MARSHACK HAYS LLP  
870 Roosevelt Avenue  
5 Irvine, CA 92620  
Telephone: (949) 333-7777  
6 Facsimile: (949) 333-7778

7 Attorneys for Chapter 7 Trustee,  
RICHARD A. MARSHACK  
8



9 UNITED STATES BANKRUPTCY COURT  
10 CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION  
11

12 In re

13 NORTHERN HOLDING, LLC,

14 Debtor.  
15  
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17  
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19

Case No. 8:20-bk-13014-MW

Chapter 7

ORDER GRANTING APPLICATION BY  
CHAPTER 7 TRUSTEE TO EMPLOY  
MARSHACK HAYS LLP AS GENERAL  
COUNSEL

APPLICATION DOCKET NO. 136

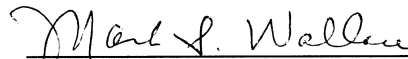
[UNOPPOSED MOTION – NO SERVICE  
OF PROPOSED JUDGMENT OR  
LODGMET PERIOD REQUIRED  
PURSUANT TO LBR 9021-1(b)(4)]

20  
21 The Court has read and considered the Application to Employ Marshack Hays LLP as  
22 General Counsel and the Declaration of D. Edward Hays in support (“Application”), filed by  
23 Chapter 7 Trustee Richard A. Marshack (“Trustee”) on July 15, 2021, as Dk. No. 136. The Court  
24 finds, based upon the proof of service of the Notice of Application filed on July 15, 2021, as Dk.  
25 No. 137, and the Declaration of Non-Opposition filed by Tinho Mang on August 3, 2021, as Dk.  
26 No. 171, that proper notice of the Application has been given and no opposition has been received.  
27 Accordingly, the Court finds good cause to grant the Application, and the Court enters its Order as  
28 follows:

1 IT IS ORDERED that the Trustee's Application to employ Marshack Hays LLP as the  
2 estate's general counsel in this case as of June 15, 2021, pursuant to 11 U.S.C. § 327 is approved.  
3 Any compensation or reimbursement of costs shall only be paid upon application to and approval  
4 by the Court pursuant to 11 U.S.C. §§ 330 or 331.

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23 Date: August 11, 2021

  
Mark S. Wallace  
United States Bankruptcy Judge

**EXHIBIT 2**

1. Name of Applicant (*specify*): MARSHACK HAYS LLP
2. This proceeding was heard at the date and place set forth above and was ☐ Contested ☒ Uncontested
3. Appearances were made as follows:
  - a. ☐ Applicant present in court
  - b. ☒ Attorney for Applicant present in court (name): APPEARANCES WERE WAIVED. NO APPEARANCES.
  - c. ☐ Attorney for United States trustee present in court
  - d. ☐ Other persons present as reflected in the court record
4. Applicant gave the required notice of the Application on (*specify date*): 04/14/2022

5. The court orders as follows:


- a. ☒ Application for Payment of Interim Fees is approved as follows:
- (1) ☒ Total amount allowed: \$ 264,129
- (2) ☒ Amount or percentage authorized for payment at this time: \$ 106,000
- b. ☒ Application for Reimbursement of Interim Expenses is approved and authorized for payment:
- ☒ Total amount allowed: \$ 6,915.79
- c. ☐ Application for Payment of Final Fees is approved in the amount of: \$ \_\_\_\_\_
- d. ☐ Application for Reimbursement of Final Expenses is approved and authorized for payment:
- ☐ Total amount allowed: \$ \_\_\_\_\_
- e. (1) ☐ Application is denied
- ☐ in full
- ☐ in part
- ☐ without prejudice
- ☐ with prejudice
- (2) Grounds for denial (*specify*):
- f. ☒ The court further orders (*specify*):

Pursuant to the Court's order authorizing Trustee to disburse cash from specifically subordinated sale proceeds of the Live Oak Property, \$106,000 is authorized to be immediately disbursed to applicant for interim payment of fees and reimbursement of expenses, leaving a balance of \$165,044.79 in remaining approved, unpaid interim fees.

Pursuant to the request in the declaration filed by Trustee on April 28, 2022, as Docket No. 325, Trustee is further authorized to pay applicant, as unencumbered or specifically designated funds become available, up to 70% of the remaining balance of allowed fees, to a maximum of \$115,531.35. The Court retains the authority to review and approve fees and costs on a final basis.

###

Date: June 10, 2022

  
Erithe Smith  
United States Bankruptcy Judge

**EXHIBIT 3**





March 14, 2025

Richard Marshack, Trustee  
870 Roosevelt Avenue  
Irvine, CA 92620

Invoice # 17852  
Client # 1015  
Matter # 146

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## INVOICE SUMMARY

For Professional Services Rendered for the period ending: February 28, 2025

**Re: Northern Holding, LLC**

Current Fees	\$ 127,546.00
Current Disbursements	<u>\$ 10,868.55</u>
<b>TOTAL CURRENT CHARGES</b>	<b>\$ 138,414.55</b>
Previous Balance	<u>\$ 42,598.00</u>
<b>TOTAL BALANCE DUE</b>	<b><u>\$ 181,012.55</u></b>

MARSHACK HAYS WOOD LLP

Richard Marshack, Trustee  
Client-Matter# 1015-146

March 14, 2025  
Invoice # 17852

**FEES**

**.1 SLO Property Tax negotiations**

Date	Atty	Description	Hours	Rate	Amount
4/01/22	KAT	E-mail correspondence from county re: nature of taxes and avoidance; E-mail correspondence to Tinho Mang re: same (.20);	.20	550.00	110.00
4/12/22	KAT	Telephone conference with Mike Gomez, Richard A. Marshack and Tinho Mang re: negotiations with County re: property taxes (.30);	.30	550.00	165.00
10/11/22	TM	Written correspondence with Erich Russell re: TTB filings showing that winery was operated;	.10	390.00	39.00
<b>Sub-Total Fees:</b>			<b>.60</b>		<b>\$ 314.00</b>

**.2 Contempt Proceedings**

Date	Atty	Description	Hours	Rate	Amount
4/01/22	DEH	Review and revise application for issuance of order to show cause re: contempt (1.20); Written correspondence with Richard A. Marshack and Tinho Mang re: same (.20);	1.40	680.00	952.00
4/01/22	LB	Review correspondence from D. Edward Hays re: revisions to order to show cause motion (.10); Conference with Tinho Mang re: same (.10); Correspondence to Lori Ensley re: declaration in support of same (.10); (No Charge)	.30	260.00	N/C
4/01/22	LB	Multiple conferences with Tinho Mang re: revisions to motion for order to show cause re: Coddling and request for judicial notice in support of same (.20); Review and finalize motion, declarations in support, and request for judicial notice (.90); Review and finalize proposed order to show cause (.10); Preparation of exhibits to the declarations and request for judicial notice (.80);	2.00	260.00	520.00
4/01/22	TM	Review and incorporate D. Edward Hays revisions to contempt motion and written correspondence with Lori Ensley re: signature on declaration;	.20	390.00	78.00
4/04/22	DEH	Telephone conference with Richard A. Marshack re: strategy for negotiations with Coddling's new counsel (.20); Conference call with Brandon Iskander and Richard A. Marshack re: same (.20);	.40	680.00	272.00

MARSHACK HAYS WOOD LLP

Richard Marshack, Trustee  
Client-Matter# 1015-146

March 14, 2025  
Invoice # 17852

Date	Atty	Description	Hours	Rate	Amount
4/04/22	TM	Telephone conference with Richard A. Marshack re: negotiation with Codding's lawyers and production of Form 1 and 2;	.20	390.00	78.00
4/04/22	TM	Review brief opposition filed by Codding to contempt motion;	.20	390.00	78.00
4/04/22	TM	Telephone conference with Richard A. Marshack re: discussing contempt issues and response from Codding's lawyers;	.30	390.00	117.00
4/05/22	DEH	Telephone conference with Richard A. Marshack re: negotiations with Rob Goe;	.20	680.00	136.00
4/05/22	LB	Conference with Tinho Mang re: preparation of stipulation to continue deadlines related to the order to show cause re: Codding (.10); Draft proposed order on stipulation (.20);	.30	260.00	78.00
4/05/22	TM	Draft stipulation to extend response deadline to order to show cause motion and written correspondence with Brandon Iskander re: same;	.60	390.00	234.00
4/05/22	TM	Review revisions to stipulation from Brandon Iskander, telephone conference with Richard A. Marshack re: same;	.20	390.00	78.00
4/05/22	TM	Draft and revise order on stipulation to extend response date for order to show cause motion;	.10	390.00	39.00
4/08/22	TM	Review written correspondence from Brandon Iskander and call to Brandon Iskander re: objection to cash disbursement motion;	.10	390.00	39.00
4/08/22	TM	Multiple telephone conferences with Richard A. Marshack, Rob Goe, and Brandon Iskander re: negotiations re: alleged contemnor;	1.50	390.00	585.00
4/08/22	TM	Telephone conference with Brandon Iskander re: possible basis to object to cash disbursement motion;	.20	390.00	78.00
4/11/22	TM	Written correspondence with Rob Goe re: rescheduling meeting;	.10	390.00	39.00
4/12/22	TM	Telephone conference with Michael Gomez and Michael Gomez and Richard A. Marshack and Michael Gomez, Richard A. Marshack, and Kristine A. Thagard re: outstanding issues with bank, tax negotiations, property management issues, reimbursement litigation with Lee Codding;	.70	390.00	273.00
4/12/22	TM	Review written correspondences from Erich Russell re: evidence to support Estate claims;	.10	390.00	39.00
4/14/22	DEH	Telephone conference with Tinho Mang re: cash disbursement motion and interim fee application;	.20	680.00	136.00
4/14/22	TM	Telephone conference with Richard A. Marshack re: negotiations with Codding and written correspondence with Brandon Iskander and Rob Goe re: same;	.30	390.00	117.00
4/14/22	TM	Telephone conference with Richard A. Marshack and Erich Russell re: discussion of facts and claims;	1.00	390.00	390.00

MARSHACK HAYS WOOD LLP

Richard Marshack, Trustee  
Client-Matter# 1015-146

March 14, 2025  
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Date	Atty	Description	Hours	Rate	Amount
4/18/22	TM	Telephone conference with Richard A. Marshack re: meeting with Lee Coddington's attorneys today;	.10	390.00	39.00
4/18/22	TM	Conference with Rob Goe, Brandon Iskander, and Richard A. Marshack re: negotiations with Coddington;	1.50	390.00	585.00
4/18/22	TM	Draft stipulation to further continue response deadline for order to show cause motion and written correspondence with Rob Goe re: same;	.30	390.00	117.00
4/19/22	LB	Revise and finalize stipulation to extend time to respond to OSC re: Leroy Coddington (.10); Draft proposed order re: stipulation (.20);	.30	260.00	78.00
4/19/22	TM	Draft and revise order on stipulation to extend opposition deadline for order to show cause motion;	.10	390.00	39.00
4/22/22	TM	Review written correspondence from Erich Russell with attached grape purchase contracts and review contracts;	.30	390.00	117.00
5/03/22	TM	Telephone conference with Richard A. Marshack and Lori Ensley re: factfinding and litigation strategy, distribution issues;	1.40	390.00	546.00
5/06/22	TM	Written correspondence with Lori Ensley re: evasive response from Jill Sanford;	.10	390.00	39.00
5/06/22	TM	Written correspondence with Rob Goe re: requested extension for response to order to show cause motion and telephone conference with Richard A. Marshack re: approval of same;	.10	390.00	39.00
5/09/22	TM	Telephone conference with Richard A. Marshack re: litigation and discovery strategy, recovery of surcharge monies;	.50	390.00	195.00
5/23/22	TM	Telephone conference with Richard A. Marshack re: initial analysis and response to settlement demand letter;	.60	390.00	234.00
5/23/22	TM	Review, research, and analyze letter and attachments from Rob Goe re: settlement demand;	1.60	390.00	624.00
6/01/22	TM	Draft and research response letter to Coddington on demand for reimbursements;	3.20	390.00	1,248.00
6/02/22	TM	Review stipulation to further extend response deadline to order to show cause;	.20	390.00	78.00
6/03/22	DEH	Telephone conference with Richard A. Marshack and Tinho Mang re: Northern settlement discussions and litigation strategy;	.30	680.00	204.00
6/03/22	TM	Written correspondence to Rob Goe re: limited extension for response to order to show cause motion;	.20	390.00	78.00
6/03/22	TM	Telephone conference with Richard A. Marshack and D. Edward Hays re: litigation strategy for order to show cause;	.50	390.00	195.00

MARSHACK HAYS WOOD LLP

Richard Marshack, Trustee  
Client-Matter# 1015-146

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Date	Atty	Description	Hours	Rate	Amount
6/03/22	TM	Revise settlement response letter per conversation with Richard A. Marshack and D. Edward Hays re: litigation strategy;	.20	390.00	78.00
6/03/22	TM	Telephone conference with Richard A. Marshack re: settlement counter-offer response;	.20	390.00	78.00
6/03/22	TM	Written correspondence to Rob Goe re: rejection of offer;	.10	390.00	39.00
6/06/22	TM	Telephone conference with Richard A. Marshack re: litigation strategy and extension request from Coddling;	.10	390.00	39.00
6/06/22	TM	Telephone conference with Robert P. Goe and written correspondence with Robert P. Goe re: requested stipulation to extend responsive deadline to order to show cause motion;	.20	390.00	78.00
6/08/22	TM	Written correspondence with Rob Goe re: settlement communications;	.20	390.00	78.00
6/09/22	TM	Written correspondence with Rob Goe re: new settlement offer from Coddling;	.10	390.00	39.00
6/15/22	TM	Written correspondence with Rob Goe re: settlement negotiations;	.20	390.00	78.00
6/15/22	TM	Review further written correspondence from Rob Goe re: settlement offer;	.10	390.00	39.00
6/15/22	TM	Telephone conference with Richard A. Marshack re: settlement negotiations and litigation prospects for contempt motion;	.70	390.00	273.00
6/15/22	TM	Telephone conference with Rob Goe and Brandon Iskander re: request for further extension;	.20	390.00	78.00
6/15/22	TM	Review and sign fifth stipulation for extension on order to show cause response;	.20	390.00	78.00
6/20/22	TM	Telephone conference with Richard A. Marshack re: litigation strategy in light of unpaid vendor invoices, calculation of unaccounted-for crop harvest;	.40	390.00	156.00
6/22/22	TM	Multiple telephone conferences with Richard A. Marshack and Richard A. Marshack and D. Edward Hays re: litigation strategy on response to Coddling;	1.50	390.00	585.00
6/23/22	TM	Review and execute sixth extension stipulation;	.20	390.00	78.00
6/28/22	TM	Review multiple written correspondences between Richard A. Marshack and Rob Goe re: litigation discussions;	.20	390.00	78.00
6/28/22	TM	Multiple telephone conferences with Richard A. Marshack re: settlement offer to Coddling;	.40	390.00	156.00
6/28/22	TM	Multiple telephone conferences with Robert P. Goe and Richard A. Marshack re: settlement negotiations;	.80	390.00	312.00

MARSHACK HAYS WOOD LLP

Richard Marshack, Trustee  
Client-Matter# 1015-146

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Date	Atty	Description	Hours	Rate	Amount
6/29/22	DEH	Telephone conference with Richard A. Marshack re: settlement negotiations and strategy (.30); Telephone conference with Tinho Mang re: same (.10);	.40	680.00	272.00
6/29/22	TM	Telephone conference with Richard A. Marshack and written correspondence with Robert P. Goe re: seventh stipulated extension of response deadline;	.20	390.00	78.00
7/05/22	DEH	Telephone conference with Richard A. Marshack re: settlement negotiations and opposition filed by respondent;	.20	680.00	136.00
7/05/22	DEH	Telephone conference with Richard A. Marshack and Tinho Mang re: strategy for reply;	.40	680.00	272.00
7/05/22	TM	Review and analyze opposition to motion for order to show cause and written correspondence to Richard A. Marshack and D. Edward Hays re: same;	.90	390.00	351.00
7/05/22	TM	Telephone conference with Richard A. Marshack re: review and analysis of opposition brief, preparation of reply;	.40	390.00	156.00
7/07/22	DEH	Telephone conference with Richard A. Marshack and Tinho Mang re: strategy for reply to Coddington's opposition;	.30	680.00	204.00
7/07/22	DEH	Telephone conference with Richard A. Marshack and Tinho Mang re: further discussions re: strategy and potential settlement;	.30	680.00	204.00
7/07/22	DEH	Review written correspondence from San Luis Obispo County District Attorneys' office re: charges against Lee Coddington for passing bad checks;	.10	680.00	68.00
7/07/22	TM	Telephone conference with Richard A. Marshack and D. Edward Hays re: preparation of reply and evidence;	.30	390.00	117.00
7/07/22	TM	Begin drafting reply to order to show cause motion;	.80	390.00	312.00
7/08/22	DEH	Telephone conference with Richard A. Marshack and Tinho Mang re: contents of and strategy for the reply brief;	.30	680.00	204.00
7/08/22	DEH	Revise and supplement reply brief (1.10); Written correspondence with Richard A. Marshack and Tinho Mang re: same (.20);	1.30	680.00	884.00
7/08/22	LB	Conference with Tinho Mang re: preparation of reply to opposition of Leroy Coddington re: Motion for Issuance of OSC (.10); Review and finalize reply and declaration of Richard A. Marshack in support of same (.50); Draft request for judicial notice (.20); Review, redact personal identifiers and preparation of evidence in support of declaration of Richard A. Marshack (.40);	1.20	260.00	312.00
7/08/22	TM	Finish draft and research order to show cause motion reply;	4.60	390.00	1,794.00

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Richard Marshack, Trustee  
Client-Matter# 1015-146

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Date	Atty	Description	Hours	Rate	Amount
7/08/22	TM	Telephone conference with Richard A. Marshack and Richard A. Marshack and D. Edward Hays re: review and revision of reply brief and declaration;	.80	390.00	312.00
7/08/22	TM	Revise and incorporate Richard A. Marshack revisions to reply brief and declaration;	.30	390.00	117.00
7/08/22	TM	Review and incorporate D. Edward Hays revisions to reply brief;	.20	390.00	78.00
7/20/22	TM	Telephone conference with Richard A. Marshack re: Trustee's position on debtor's redemption offer;	.10	390.00	39.00
9/07/22	TM	Telephone conference with Richard A. Marshack re: reassignment of case and litigation strategy for order to show cause;	.10	390.00	39.00
9/08/22	TM	Review order setting order to show cause motion for hearing and written correspondence with Michael Gomez re: same;	.20	390.00	78.00
9/09/22	TM	Written correspondence with Rodney Meeks re: setting of hearing on contempt;	.10	390.00	39.00
10/05/22	CM	Telephone conference with Tinho Mang re: pending supplemental brief (No Charge);	.10	260.00	N/C
10/18/22	LB	Preparation of documents re: order to show cause of Leroy Codding per Judge's instructions;	.20	260.00	52.00
10/18/22	LB	Review and finalize compendium of order in support of order to show cause motion;	.40	260.00	104.00
10/18/22	TM	Telephone conference with Annika Singh from chambers re: request for delivery of judge's copies and filing compendium;	.10	390.00	39.00
10/18/22	TM	Draft compendium of orders and stipulations as requested by court;	.30	390.00	117.00
10/19/22	TM	Brief telephone conference with Richard A. Marshack re: hearing next week (No Charge);	.10	390.00	N/C
10/24/22	TM	Telephone conference with Richard A. Marshack re: tentative ruling for Wednesday and review tentative ruling;	.10	390.00	39.00
10/24/22	TM	Written correspondence with Rodney Meeks re: rejection of settlement offer and response to request for hearing connection information;	.20	390.00	78.00
10/25/22	TM	Telephone conference with Richard A. Marshack re: settlement negotiations and new information from attorney, discussing hearing tomorrow;	.30	390.00	117.00
10/25/22	TM	Preparation for hearing;	.90	390.00	351.00
10/26/22	CVH	Conferences with Tinho Mang and the Trustee re: hearing results (.30) (No Charge);	.30	490.00	N/C



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Richard Marshack, Trustee  
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Date	Atty	Description	Hours	Rate	Amount
10/26/22	TM	Preparation for and attendance at hearing on motion for order to show cause;	3.20	390.00	1,248.00
10/26/22	TM	Multiple telephone conferences with Richard A. Marshack re: outcome of order to show cause hearing and litigation strategy;	.30	390.00	117.00
10/26/22	TM	Review entered order to show cause and written correspondence to Michael Gomez re: same;	.20	390.00	78.00
10/27/22	TM	Telephone conference with Richard A. Marshack re: discovery plan;	.20	390.00	78.00
10/27/22	TM	Telephone conference with Mike Gomez re: discussing order to show cause and distribution of cash collateral;	.20	390.00	78.00
11/01/22	DAW	Conference with Tinho Mang re: hearing results on the order to show cause and strategy moving forward;	.20	490.00	98.00
11/04/22	TM	Begin drafting discovery requests to Codding;	1.90	390.00	741.00
11/11/22	LB	Conference with Tinho Mang re: preparation of discovery to insiders and third party banks;	.20	260.00	52.00
11/11/22	TM	Written correspondence to Erich Russell re: third-party discovery;	.10	390.00	39.00
11/14/22	DEH	Telephone conference with Richard A. Marshack and Tinho Mang re: trial discovery and strategy;	.30	680.00	204.00
11/14/22	LB	Preparation of Order on order to show cause to Lee Codding and Robert Goe;	.10	260.00	26.00
11/14/22	TM	Review forwarded written correspondence from Richard A. Marshack and telephone conference with Awalt drilling re: request for unpaid invoice;	.20	390.00	78.00
11/14/22	TM	Written correspondence to Robert P. Goe re: deposition for Codding;	.10	390.00	39.00
11/14/22	TM	Telephone conference with Kirk Awalt re: outstanding unpaid invoices from water consultant;	.20	390.00	78.00
11/14/22	TM	Telephone conference with Richard A. Marshack and D. Edward Hays re: litigation strategy;	.50	390.00	195.00
11/15/22	LB	Draft request for admissions to Lee Codding (.30); Draft interrogatories to Lee Codding (.20); Review and revise request for production of documents to Lee Codding (.10); Draft subpoena to Lee Codding re: deposition (.20); Draft notice of deposition of Lee Codding (.30); Draft subpoena to Steven Jones (.10); Draft notice of deposition to Steven Jones (.10); Draft subpoena to Mike Sanford (.10); Draft notice of deposition to Mike Sanford (.10);	1.50	260.00	390.00



MARSHACK HAYS WOOD LLP

Richard Marshack, Trustee  
Client-Matter# 1015-146

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Date	Atty	Description	Hours	Rate	Amount
11/15/22	LB	Draft third party subpoena to Wells Fargo (.30); Draft notice of service of subpoena to Wells Fargo (.20); Draft document request to Wells Fargo (.30); Draft third party subpoena to CoastHills Credit Union (.10); Draft notice of service of subpoena to CoastHills Credit Union (.10); Draft document request to CoastHills Credit Union (.10);	1.10	260.00	286.00
11/16/22	TM	Review forwarded written correspondences from Kirk Awalt re: Lee Codding;	.20	390.00	78.00
11/21/22	TM	Telephone conference with Richard A. Marshack and Kirk Awalt re: settlement negotiations;	.30	390.00	117.00
11/28/22	TM	Begin drafting discovery requests for Lee Codding;	5.20	390.00	2,028.00
12/01/22	TM	Finish drafting first set of written discovery to Lee Codding;	4.50	390.00	1,755.00
12/01/22	TM	Written correspondence to Robert P. Goe and Brandon Iskander re: discovery;	.10	390.00	39.00
12/08/22	TM	Review written correspondence from Kerry Murphy with Rob Goe's office re: discovery requests propounded by Lee;	.10	390.00	39.00
12/08/22	TM	Review motion to withdraw as counsel filed by Codding's counsel and written correspondence to D. Edward Hays and Richard A. Marshack re: analysis of same;	.20	390.00	78.00
12/09/22	TM	Draft and revise deposition materials for Steven Jones;	.40	390.00	156.00
12/09/22	TM	Draft and revise deposition materials for Lee Codding;	.40	390.00	156.00
12/12/22	LB	Correspondence to nationwide re: skip trace information for subpoena to Steve Jones;	.10	260.00	26.00
12/12/22	TM	Multiple written correspondences with Robert P. Goe re: request for extension of deadlines and evidentiary hearing by Codding's counsel;	.20	390.00	78.00
12/12/22	TM	Telephone conference with Richard A. Marshack re: response to discovery and request from counsel to withdraw;	.30	390.00	117.00
12/16/22	DEH	Telephone conference with Tinho Mang re: meet and confer letter re: discovery dispute and Trustee's response to motion to be relieved as counsel;	.30	680.00	204.00
12/16/22	TM	Telephone conference with D. Edward Hays re: discussion of discovery and withdrawal issue;	.20	390.00	78.00
12/16/22	TM	Draft meet and confer re: discovery requests propounded by exiting counsel;	1.40	390.00	546.00
12/19/22	TM	Draft meet-and-confer letter to Codding's counsel based on call with Richard A. Marshack;	.60	390.00	234.00

MARSHACK HAYS WOOD LLP

Richard Marshack, Trustee  
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Date	Atty	Description	Hours	Rate	Amount
12/19/22	TM	Written correspondence to Erich Russell re: service information for Steve Jones;	.10	390.00	39.00
12/19/22	TM	Telephone conference with Richard A. Marshack re: discovery disputes;	.40	390.00	156.00
12/19/22	TM	Review written correspondence from Erich Russell re: service information for Steven Jones;	.10	390.00	39.00
12/21/22	TM	Telephone conference with Robert P. Goe re: discovery dispute and withdrawal of counsel;	.30	390.00	117.00
12/21/22	TM	Revise discovery stipulation with reference to specific discovery propounded;	.90	390.00	351.00
12/21/22	TM	Review show cause hearing transcript and draft corrections for court reporter;	.70	390.00	273.00
12/22/22	DEH	Written correspondence between Rob Goe, Brandon Iskander, and Tinho Mang re: proposed stipulation;	.10	680.00	68.00
12/22/22	TM	Telephone conference with Richard A. Marshack re: discovery dispute and further revise discovery extension stipulation to add conditions from Trustee;	.30	390.00	117.00
12/22/22	TM	Telephone conference with Richard A. Marshack re: discovery dispute;	.20	390.00	78.00
12/22/22	TM	Telephone conference with Richard A. Marshack and Robert P. Goe re: discovery dispute and extension on deadline to object to motion to withdraw;	.20	390.00	78.00
12/23/22	TM	Further revise stipulation with Robert P. Goe and written correspondence with Robert P. Goe re: same;	.40	390.00	156.00
12/23/22	TM	Telephone conference with Richard A. Marshack re: approval of Robert P. Goe revisions to discovery stipulation;	.10	390.00	39.00
12/27/22	TM	Revise proposed order granting discovery stipulation and written correspondence with Robert P. Goe and Brandon Iskander re: same;	.40	390.00	156.00
12/27/22	TM	Telephone conference with Pam Kraus and Richard A. Marshack re: discovery and collecting Trustee communications;	.20	390.00	78.00
12/28/22	TM	Telephone conference with Layla Buchanan re: service of subpoenas on Steve Jones;	.10	390.00	39.00
12/28/22	TM	Draft third-party subpoena to Wells Fargo Bank NA;	1.50	390.00	585.00
12/28/22	TM	Draft third-party subpoena and notices to CoastHills Credit Union;	.40	390.00	156.00
1/03/23	TM	Telephone conference with Tim Lambirth re: subpoena to Steve Jones;	.20	390.00	78.00

MARSHACK HAYS WOOD LLP

Richard Marshack, Trustee  
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Date	Atty	Description	Hours	Rate	Amount
1/03/23	TM	Telephone conference with Richard A. Marshack re: involvement of Tim Lambirth and deposition against Jones;	.20	390.00	78.00
1/04/23	LB	Review and respond to correspondence from Robyn Franklin at CoastHills Bank re: subpoena for document production;	.10	260.00	26.00
1/04/23	TM	Multiple written correspondences with representative from Coasthills Credit Union re: subpoena response;	.10	390.00	39.00
1/04/23	TM	Review entered order continuing discovery and hearing on OSC;	.10	390.00	39.00
1/04/23	TM	Review declaration of non-opposition and order authorizing withdrawal of counsel;	.10	390.00	39.00
1/05/23	DEH	Written correspondence with Richard A. Marshack and Tinho Mang re: settlement negotiations with grape harvester;	.20	680.00	136.00
1/11/23	TM	Telephone conference with Tim Lambirth re: possible settlement and scheduling deposition for Jones;	.50	390.00	195.00
1/12/23	LB	Review and respond to correspondence to court reporter re: rescheduled deposition of Steven Jones;	.10	260.00	26.00
1/17/23	LB	Draft subpoena to Bank of America (.20); Draft notice of service of subpoena re: same (.20); Draft document production to subpoena (.20);	.60	260.00	156.00
1/17/23	TM	Written correspondence with Lee Coddling re: request for extension and accommodation on deposition date;	.20	390.00	78.00
1/17/23	TM	Download and briefly review CoastHills Credit Union statements and subpoena response;	.30	390.00	117.00
1/18/23	TM	Telephone conference with Tim Lambirth re: deposition of Steve Jones and Lambirth's proposal to mediate a resolution;	.30	390.00	117.00
1/19/23	LB	Correspondence to court reporter re: deposition of Steven Jones;	.10	260.00	26.00
1/19/23	TM	Written correspondence to Tim Lambirth re: deposition information;	.10	390.00	39.00
1/20/23	TM	Draft and revise BofA subpoena;	.40	390.00	156.00
1/23/23	TM	Prepare for Steve Jones deposition;	.70	390.00	273.00
1/24/23	TM	Video deposition of Steven Jones;	2.70	390.00	1,053.00
1/26/23	TM	Telephone conference with Lori Ensley re: testifying at evidentiary hearing;	.10	390.00	39.00
1/26/23	TM	Written correspondence with BofA representative re: request for additional identifying information on subpoena targets;	.30	390.00	117.00
1/27/23	TM	Review three letters from Wells Fargo in response to subpoena;	.20	390.00	78.00

MARSHACK HAYS WOOD LLP

Richard Marshack, Trustee  
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Date	Atty	Description	Hours	Rate	Amount
2/07/23	TM	Review BofA statements produced for 7 credit cards and 10 bank accounts and draft notes;	2.00	390.00	780.00
2/07/23	TM	Annotate and chart Wells Fargo and CoastHills statements provided, written correspondence to D. Edward Hays re: whether Wells Fargo has provided access instructions;	.60	390.00	234.00
2/08/23	DEH	Written correspondence with Tinho Mang re: document production by Wells Fargo;	.20	680.00	136.00
2/08/23	TM	Review and annotate Wells Fargo statements;	1.20	390.00	468.00
2/08/23	TM	Written correspondence with Erich Russell re: attempt to serve subpoena;	.10	390.00	39.00
2/08/23	TM	Telephone conference with Richard A. Marshack re: litigation update and review of bank statements, revenue lost;	.30	390.00	117.00
2/13/23	TM	Telephone conference with Tim Lambirth re: subpoena requests to banking institutions and possibility of settlement discussions;	.20	390.00	78.00
2/15/23	TM	Telephone conference with Richard A. Marshack re: litigation strategy and discovery for evidentiary hearing;	.40	390.00	156.00
2/17/23	TM	Telephone conference with attorney seeking to collect debt from Lee Codding for unpaid residential lease;	.20	390.00	78.00
2/22/23	DAW	Review and respond to multiple e-mail correspondence from Tinho Mang re: RFA's deemed admitted in the Lee Coding evidentiary hearing (No Charge);	.20	490.00	N/C
2/23/23	TM	Review Codding/Marshack email communications;	2.50	390.00	975.00
2/24/23	TM	Finish reviewing Lee Codding communications and attachments to Richard A. Marshack;	1.40	390.00	546.00
2/27/23	TM	Review case file and begin working on joint pretrial stipulation;	2.90	390.00	1,131.00
3/01/23	TM	Telephone conference with Richard A. Marshack re: preparation for evidentiary hearing;	.10	390.00	39.00
3/02/23	TM	Continue drafting pretrial stipulation;	2.10	390.00	819.00
3/03/23	TM	Continue drafting pretrial stipulation;	3.70	390.00	1,443.00
3/06/23	TM	Telephone conference with Tim Lambirth re: potential for subpoenaing witness Steve Jones;	.20	390.00	78.00
3/06/23	TM	Written correspondence to Tim Lambirth re: subpoena for witness Steven Jones;	.30	390.00	117.00
3/06/23	TM	Telephone conference with Lori Ensley re: availability for witness on behalf of Trustee;	.10	390.00	39.00
3/06/23	TM	Continue drafting pretrial stipulation;	1.10	390.00	429.00

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Date	Atty	Description	Hours	Rate	Amount
3/07/23	TM	Leave voicemail for Paul Greco and written correspondence to Paul Greco re: possible testimony for representative of Nevarez Farm Labor;	.10	390.00	39.00
3/07/23	TM	Finish initial draft of joint pretrial stipulation and re:-review client file received from RHM Law on case;	5.20	390.00	2,028.00
3/08/23	LB	Preparation of and redaction of personal identifiers to exhibits for trial re: OSC of Mr. Codding;	1.50	260.00	390.00
3/08/23	TM	Telephone conference with Richard A. Marshack re: litigation strategy and scheduling;	.40	390.00	156.00
3/08/23	TM	Review text messages between Trustee and Lee Codding;	.40	390.00	156.00
3/08/23	TM	Written correspondence with Betsy Roth re: witness and subpoena;	.10	390.00	39.00
3/08/23	TM	Draft subpoenas for witness attendance and update pretrial stipulation;	.40	390.00	156.00
3/08/23	TM	Telephone conference with Layla Buchanan re: preparation of evidentiary hearing exhibits and service of subpoenas, witness fees (No Charge);	.40	390.00	N/C
3/08/23	TM	Written correspondence with Paul Greco re: witness attendance by Juan Nevarez and consent to electronic service of subpoena;	.10	390.00	39.00
3/08/23	TM	Leave voicemail for Mike Sanford re: witness for evidentiary hearing;	.10	390.00	39.00
3/09/23	LB	Review and finalize subpoena to Nevarez (.10); Correspondence re: same (.10);	.20	260.00	52.00
3/09/23	LB	Review and finalize subpoena to Azcona (.10); Correspondence re: same (.10);	.20	260.00	52.00
3/14/23	LB	Review and prepare voluminous bank statements for trial (1.60); Draft memorandum to Tinho Mang re: trial preparation and deadlines (.20);	1.80	260.00	468.00
3/14/23	TM	Written correspondence to Lee Codding re: proposed pretrial stipulation;	.20	390.00	78.00
3/15/23	LB	Conference with Tinho Mang re: preparation of trial exhibits and revisions to joint pretrial stipulation (.20); Conference with Tinho Mang re: preparation of correspondence and fees to witnesses re: OSC hearing (.10);	.30	260.00	78.00
3/16/23	LB	Review and preparation of trial documents;	.60	260.00	156.00
3/16/23	LB	Review and finalize subpoena to Steve Jones (.20); Draft correspondence to Timothy Lambirth re: same (.10);	.30	260.00	78.00

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3/16/23	TM	Telephone conference with Tim Lambirth re: appearance by Jones at evidentiary hearing and Zoom alternatives;	.10	390.00	39.00
3/16/23	TM	Written correspondence to Tim Lambirth re: Jones' contention that he is not available for hearing;	.10	390.00	39.00
3/16/23	TM	Written correspondence with Lee Codding re: requests for admissions and deemed admissions;	.20	390.00	78.00
3/16/23	TM	Revise and update subpoena to Steve Jones;	.10	390.00	39.00
3/16/23	TM	Telephone conference with Kathleen Frederick re: preparation of email exhibits (No Charge);	.10	390.00	N/C
3/20/23	LB	Conference with Tinho Mang re: preparation of revised subpoenas for continued hearing on OSC re: Mr. Codding (.10); Draft subpoena to Steve Jones (.10); Correspondence to Tim Lambreth re: same (.10); Draft subpoena to Nevarez (.10); Correspondence to Juan Nevarez re: same (.10); Draft subpoena to Azcona (.10); Correspondence to Betsy Roth re: same (.10); Review and revise subpoena to Lori Ensley (.10); Correspondence to Lori Ensley re: continued hearing on OSC (.10);	.90	260.00	234.00
3/20/23	TM	Review court order continuing evidentiary hearing and telephone conference with Richard A. Marshack re: same;	.10	390.00	39.00
3/20/23	TM	Draft and research motion to permit remote appearances by witnesses;	2.00	390.00	780.00
3/21/23	LB	Correspondence to Lori Ensley re: continued hearing on OSC re: Mr. Codding;	.10	260.00	26.00
3/21/23	TM	Written correspondence with Lori Ensley re: subpoena for May 11 hearing;	.10	390.00	39.00
3/29/23	LB	Review and preparation of voluminous trial exhibits related to order to show cause of Codding;	.40	260.00	104.00
3/30/23	TM	Followup written correspondence to Lee Codding re: request for conference;	.10	390.00	39.00
4/05/23	TM	Review trial exhibits for production, written correspondence with Layla Buchanan and KF re: same;	2.40	430.00	1,032.00
4/11/23	TM	Written correspondence with Tim Lambirth re: witness fee for Jones in response to Lambirth's question;	.10	430.00	43.00
4/11/23	TM	Revise and update motion in limine for remote witness appearances;	.80	430.00	344.00
4/14/23	TM	Written correspondence to Betsy Roth re: confirming changed hearing date;	.10	430.00	43.00

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Date	Atty	Description	Hours	Rate	Amount
4/14/23	TM	Written correspondence to Paul Greco re: confirming changed hearing date and appearance of witness;	.10	430.00	43.00
4/14/23	TM	Written correspondence to Lee Codding re: followup request for meet and confer;	.10	430.00	43.00
4/17/23	TM	Written correspondence with Lee Codding re: scheduling meet and confer;	.10	430.00	43.00
4/18/23	TM	Telephone conference with Kevin Coleman re: inquiry from interested party who was previously scammed by Lee;	.20	430.00	86.00
4/19/23	TM	Begin drafting evidentiary hearing trial brief;	3.90	430.00	1,677.00
4/20/23	TM	Review 200-page deposition transcript for Steve Jones during bankruptcy case in preparation for evidentiary hearing;	1.90	430.00	817.00
4/25/23	LB	Preparation of trial exhibits and trial exhibit tags;	2.90	290.00	841.00
4/25/23	TM	Revise and update pretrial stipulation and written correspondence with Lee Codding re: intent to examine various individuals;	.30	430.00	129.00
4/25/23	TM	Telephone conference with Lori Ensley re: appearance at hearing in two weeks and intent of Codding to cross-examine;	.10	430.00	43.00
4/26/23	LB	Preparation of trial exhibit binders, registers, indexes and trial documents pursuant Judge's local rules;	1.50	290.00	435.00
4/27/23	TM	Revise and update pretrial stipulation to be a unilateral pretrial stipulation;	.40	430.00	172.00
4/27/23	TM	Multiple written correspondences with Leroy Codding re: providing electronic copy of exhibits which he has trouble accessing;	.20	430.00	86.00
4/27/23	TM	Draft and revise declaration in support of unilateral pretrial stipulation;	.20	430.00	86.00
4/27/23	TM	Draft and research evidentiary hearing trial brief;	8.90	430.00	3,827.00
4/28/23	DEH	Telephone conference with Tinho Mang re: evidentiary hearing and Codding's retention of Tony Bisconti;	.20	690.00	138.00
4/28/23	TM	Written correspondence with Tony Bisconti re: request for continuance of hearing;	.20	430.00	86.00
4/28/23	TM	Telephone conference with Richard A. Marshack re: Tony Bisconti request for continuance;	.10	430.00	43.00
4/28/23	TM	Telephone conference with D. Edward Hays re: Tony Bisconti request for continuance and response from Richard A. Marshack;	.10	430.00	43.00
4/28/23	TM	Telephone conference with Tony Bisconti re: potential employment on behalf of Lee Codding;	.40	430.00	172.00



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Date	Atty	Description	Hours	Rate	Amount
5/01/23	TM	Telephone conference with Richard A. Marshack re: no extension given to Bisconti;	.10	430.00	43.00
5/02/23	TM	Draft and revise order granting motion in limine;	.10	430.00	43.00
5/05/23	TM	Written correspondences to Tony Bisconti, Tim Lambirth, Nick/Betsy Azcona, Paul Greco/Juan Nevarez, and Lori Ensley re: courtesy notification of Zoom availability for testimony;	.30	430.00	129.00
5/05/23	TM	Review tentative ruling for Thursday's hearing;	.10	430.00	43.00
5/08/23	TM	Telephone conference with Richard A. Marshack re: pre-preparation discussion for Thursday's hearing;	.30	430.00	129.00
5/09/23	TM	Telephone conference with Richard A. Marshack re: hearing preparation;	.90	430.00	387.00
5/09/23	TM	Pre-evidentiary hearing preparation;	4.70	430.00	2,021.00
5/09/23	BNB	Conference with Tinho Mang re: upcoming evidentiary hearing (No Charge);	.30	360.00	N/C
5/10/23	TM	Preparation for evidentiary hearing;	4.20	430.00	1,806.00
5/11/23	DEH	Court hearing re: contempt trial against Lee Coddling; Written correspondence with Richard A. Marshack and Tinho Mang re: same; (No Charge)	2.10	690.00	N/C
5/11/23	TM	Attendance at evidentiary hearing on Coddling contempt;	11.30	430.00	4,859.00
5/12/23	TM	Draft stipulation re: civil contempt;	1.90	430.00	817.00
5/12/23	TM	Telephone conference with Richard A. Marshack re: revisions to contempt stipulation, revise same, circulate revised version;	.30	430.00	129.00
5/12/23	TM	Further revise stipulation per comments from Richard A. Marshack and draft proposed order granting stipulation to be incorporated into stipulation;	1.10	430.00	473.00
5/17/23	TM	Review and respond to emails from Lee Coddling re: outstanding farming expenses left unpaid per contempt proceedings;	.20	430.00	86.00
5/22/23	LB	Conference with Richard A. Marshack re: preparation of transcript from order to show cause evidentiary hearing (No Charge);	.10	290.00	N/C
5/23/23	TM	Review court order advancing hearing and setting briefing schedule;	.10	430.00	43.00
5/30/23	TM	Telephone conference with Richard A. Marshack re: status of Coddling compliance and continued hearing dates;	.10	430.00	43.00
5/31/23	TM	Written correspondence with Lee Coddling re: payment remittance information;	.10	430.00	43.00



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Date	Atty	Description	Hours	Rate	Amount
6/01/23	TM	Review written correspondences between Richard A. Marshack and Lee Codding re: payment today of cashier's check;	.10	430.00	43.00
6/05/23	LB	Review and finalize status report re: OSC Hearing;	.40	290.00	116.00
6/05/23	TM	Review entered order approving contempt stipulation as revised by FCW stipulation;	.10	430.00	43.00
6/05/23	TM	Telephone conference with Richard A. Marshack re: filing status report on contempt issues;	.20	430.00	86.00
6/05/23	TM	Draft contempt status report;	2.50	430.00	1,075.00
6/13/23	TM	Review tentative ruling for tomorrow's hearing;	.10	430.00	43.00
6/13/23	TM	Telephone conference with Richard A. Marshack re: appearance at hearing tomorrow to apprise court of status on contempt;	.10	430.00	43.00
6/13/23	TM	Review email from Richard A. Marshack to Lee Codding re: attendance at hearing tomorrow;	.10	430.00	43.00
6/14/23	TM	Preparation for hearing on order to show cause including multiple telephone conferences with Richard A. Marshack re: strategy, leave voicemail for court requesting remote connection information if any;	.90	430.00	387.00
6/15/23	LB	Draft notice of continued hearing re: OSC of Codding;	.20	290.00	58.00
6/15/23	TM	Draft and revise notice of continued order to show cause hearing;	.10	430.00	43.00
6/16/23	LB	Review and finalize notice of continued status conference (.20); Correspondence to Lee Codding (.10);	.30	290.00	87.00
6/16/23	TM	Telephone conference with Richard A. Marshack re: response to Codding and notice of non-payment;	.20	430.00	86.00
6/26/23	TM	Written correspondence with Lee Codding re: failure to fund and status report;	.10	430.00	43.00
6/27/23	TM	Draft and circulate proposed joint status report to Lee Codding;	.60	430.00	258.00
6/28/23	TM	Review Lee Codding comments and add to joint status report, circulate same;	.20	430.00	86.00
7/03/23	TM	Written correspondence with Lee Codding re: status of payment;	.10	430.00	43.00
7/06/23	TM	Telephone conference with Richard A. Marshack re: settlement negotiation with Nick Azcona and status of payment by Lee Codding;	.20	430.00	86.00
7/07/23	TM	Telephone conference with Lee Codding re: request for details on loan and payment to the estate;	.10	430.00	43.00
7/11/23	TM	Review tentative ruling for hearing tomorrow and written correspondence to Lee Codding re: hearing vacated;	.10	430.00	43.00

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Date	Atty	Description	Hours	Rate	Amount
7/25/23	TM	Review multiple written correspondences between Richard A. Marshack and Lee Codding re: modification to stipulated settlement terms on contempt;	.10	430.00	43.00
7/27/23	LB	Draft order on stipulation with Codding re: contempt motion;	.20	290.00	58.00
7/27/23	TM	Draft and revise order approving second contempt stipulation;	.10	430.00	43.00
7/28/23	LB	Review and finalize stipulation re: Contempt Motion with Leroy Codding (.10); Review and finalize proposed order re: same (.10);	.20	290.00	58.00
8/10/23	LB	Draft notice of continued hearing on OSC re: Codding;	.20	290.00	58.00
8/10/23	TM	Review and revise notice of continued order to show cause hearing;	.10	430.00	43.00
8/30/23	TM	Draft and circulate updated status report on contempt;	.20	430.00	86.00
9/12/23	TM	Written correspondence with Lee Codding re: no payment and deadline to pay is today;	.10	430.00	43.00
9/13/23	CB	Revise and finalize joint status report re: ongoing civil contempt proceedings; Prepare judge's copy re: same;	.60	290.00	174.00
9/22/23	TM	Telephone conference with Richard A. Marshack re: next week's hearing on civil contempt;	.10	430.00	43.00
9/25/23	TM	Review tentative ruling on order to show cause and written correspondence with Richard A. Marshack re: same;	.10	430.00	43.00
9/27/23	CM	Revise and finalize order adjudicating Leroy E. Codding, IV in civil contempt and imposition of sanctions (.40); Revise and finalize notice of lodgment re: order (.20); Draft e-mail to Tinho Mang, D. Edward Hays and calendar clerk re: same (.10);	.70	290.00	203.00
9/27/23	TM	Telephone conference with Richard A. Marshack re: instructions for the hearing today;	.10	430.00	43.00
9/27/23	TM	Preparation for and attendance at continued order to show cause hearing;	1.10	430.00	473.00
9/27/23	TM	Draft civil contempt order;	.60	430.00	258.00
10/05/23	TM	Review and forward sanctions order to Lee Codding;	.30	430.00	129.00
10/06/23	TM	Written correspondence with Lee Codding re: status update on failing to pay on time, telephone conference with Richard A. Marshack re: same;	.20	430.00	86.00
10/09/23	TM	Review written correspondence from Lee Codding re: security interest in inventory;	.10	430.00	43.00
10/16/23	TM	Review and forward tentative ruling on continued order to show cause hearing;	.10	430.00	43.00

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Date	Atty	Description	Hours	Rate	Amount
10/17/23	DEH	Telephone conference with Richard A. Marshack and Tinho Mang re: status and potential alternatives for resolving order to show cause re: contempt;	.30	690.00	207.00
10/17/23	TM	Telephone conference with Richard A. Marshack without Lee Codding re: discussing tomorrow's hearing and strategizing re: sanctions and ensuring the estate gets paid;	.80	430.00	344.00
10/17/23	TM	Telephone conference with Lee Codding and Richard A. Marshack re: discussing contempt hearing tomorrow and information on status of payment;	.40	430.00	172.00
10/18/23	LB	Review and finalize notice of continued hearing;	.20	290.00	58.00
10/18/23	TM	Draft notice of continued hearing on order to show cause;	.20	430.00	86.00
10/18/23	TM	Preparation for and attendance at hearing on contempt by Codding;	2.40	430.00	1,032.00
11/06/23	CM	Revise and finalize Trustee's status report re: ongoing civil contempt proceedings (.40); Draft e-mail to Tinho Mang and D. Edward Hays re: same (.10);	.50	290.00	145.00
11/06/23	CM	Draft e-mail to Tinho Mang re: status of status report re: civil contempt in support of November 8 hearing (No Charge);	.10	290.00	N/C
11/06/23	TM	Telephone conference with Richard A. Marshack re: settlement and subordination rights as to the labor costs, status report for Codding;	.20	430.00	86.00
11/06/23	TM	Multiple written correspondences with Michael Gomez re: settlement negotiations and request for explanation on olive proceeds, review documents re: same;	.40	430.00	172.00
11/06/23	TM	Draft status report on contempt;	.60	430.00	258.00
11/06/23	TM	Telephone conference with Lee Codding re: status of payments, preparation of status report;	.10	430.00	43.00
11/13/23	TM	Review written correspondence from Lee Codding re: update on payment timing and telephone conference with Richard A. Marshack re: same;	.10	430.00	43.00
11/14/23	LB	Review and finalize status report re: civil contempt;	.20	290.00	58.00
11/14/23	TM	Multiple written correspondences with Lee Codding re: update on payment status and further excuses and delays from Codding;	.10	430.00	43.00
11/14/23	TM	Draft updated status report re: contempt for 11-16 hearing;	.30	430.00	129.00
12/04/23	TM	Written correspondence with Lee Codding re: further reasons why he cannot pay by 12/6;	.10	430.00	43.00

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Date	Atty	Description	Hours	Rate	Amount
12/06/23	DEH	Court appearance at United States Bankruptcy Court, Santa Ana re: hearing on status of Codding purging contempt (.50); Written correspondence with Richard A. Marshack and Tinho Mang re: same (.20);	.70	690.00	483.00
12/07/23	LB	Draft notice of continued hearing re: OSC Contempt of Lee Codding;	.30	290.00	87.00
12/07/23	TM	Draft and revise notice of continued contempt hearing;	.20	430.00	86.00
1/02/24	LB	Draft status report re: order to show cause re: civil contempt of Codding;	.20	290.00	58.00
1/02/24	TM	Multiple written correspondences with Lee Codding re: update on status of payment of contempt sanctions;	.20	430.00	86.00
1/02/24	TM	Draft status report on civil contempt and multiple written correspondences with Lee Codding re: same;	.70	430.00	301.00
1/04/24	DEH	Written correspondence with Lee Codding and Tinho Mang re: status of payment;	.10	690.00	69.00
1/05/24	TM	Written correspondence with Lee Codding re: further update on status of payment;	.10	430.00	43.00
1/08/24	DEH	Telephone conference with Richard A. Marshack and Tinho Mang re: strategy for hearing;	.20	690.00	138.00
1/08/24	TM	Review tentative ruling for hearing tomorrow and telephone conference with Richard A. Marshack re: same;	.10	430.00	43.00
1/09/24	LB	Conference with Tinho Mang re: preparation of order on order to show cause hearing for Mr. Codding (.10); Draft order on order to show cause (.20);	.30	290.00	87.00
1/09/24	TM	Draft and revise order continuing status conference on contempt;	.20	430.00	86.00
1/09/24	TM	Telephone conference with Richard A. Marshack re: outcome of hearing on contempt today;	.20	430.00	86.00
1/09/24	TM	Preparation for and attendance at Zoom hearing on civil contempt;	1.30	430.00	559.00
1/11/24	TM	Telephone conference with Lee Codding and Jeremy Salamera re: discussing loan details with contemnnor and loan agent (.30); Written correspondence with Lee Codding re: confirming details on same (.10);	.40	430.00	172.00
1/12/24	TM	Multiple written correspondences with Lee Codding re: call to discuss with estate attorneys and rescheduling (No Charge);	.10	430.00	N/C
1/17/24	TM	Telephone conference with Nina Decker and also Richard A. Marshack re: discussion with estate attorney re: proposed loan transaction and funding to Lee;	.70	430.00	301.00

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Date	Atty	Description	Hours	Rate	Amount
1/17/24	BNB	Conference with Richard A. Marshack, Tinho Mang, and D. Edward Hays re: summary of recent developments in case (No Charge);	.10	360.00	N/C
1/18/24	TM	Draft exigent status report re: deception by contemnor;	1.40	430.00	602.00
1/18/24	TM	Telephone conference with Richard A. Marshack re: revisions to status report to the court and possibility of further sanctions;	.10	430.00	43.00
1/19/24	CM	Revise and finalize Trustee's exigent status report re: ongoing civil contempt proceedings; declarations of Tinho Mang and Richard A. Marshack (.40); Draft e-mail to D. Edward Hays, Tinho Mang and Layla Buchanan re: same (.10); Draft e-mail to Lee Codding re: same (.10);	.60	290.00	174.00
1/19/24	TM	Draft declarations in support of status report and written correspondence to Richard A. Marshack re: review of same;	.60	430.00	258.00
1/19/24	TM	Telephone conference with Richard A. Marshack re: review of report to the court and revisions suggested;	.20	430.00	86.00
1/19/24	TM	Update and revise declarations per Richard A. Marshack comments to status report;	.20	430.00	86.00
1/19/24	TM	Final requested supplemental revisions from Richard A. Marshack on declarations;	.10	430.00	43.00
1/19/24	TM	Leave message for chambers re: filing of status update;	.10	430.00	43.00
1/23/24	TM	Review further written correspondences between Lee Codding and Richard A. Marshack re: discussing whether Codding has lied;	.20	430.00	86.00
1/24/24	TM	Telephone conference with Richard A. Marshack re: Codding supplemental declaration if he so chooses;	.10	430.00	43.00
1/26/24	TM	Review documents forwarded by Lee Codding and written correspondence with Lee Codding re: his request to file his mother's drivers license;	.20	430.00	86.00
1/29/24	TM	Telephone conference with Lisa Kajani re: discussion of Lee's ongoing contempt proceedings and forwarding documents filed and presented;	.40	430.00	172.00
1/29/24	TM	Review revised tentative ruling and forward to Lee Codding;	.10	430.00	43.00
1/30/24	TM	Telephone conference with Lisa Kajani re: response to attorney's questions about ongoing civil contempt proceedings and information on further documents signed by Carol Codding;	.20	430.00	86.00
1/31/24	LB	Review and finalize order re: continued contempt hearing;	.10	290.00	29.00
2/08/24	TM	Telephone conference with Richard A. Marshack re: possible requests for additional coercive measures against Codding;	.20	430.00	86.00

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Date	Atty	Description	Hours	Rate	Amount
2/20/24	TM	Draft and research status report for Codding hearing on 2-27;	1.90	430.00	817.00
2/22/24	TM	Review written correspondence from Lee Codding re: wire transfer "confirmation" document and contradictory requests for continuance contained in unsworn declaration;	.30	430.00	129.00
2/22/24	TM	Review tentative ruling for Tuesday's hearing and forward to Lee Codding and Richard A. Marshack;	.10	430.00	43.00
2/23/24	TM	Multiple written correspondences with Lee Codding re: his request for courtesy filing of additional documents and questions on why the wire transfer has not been made;	.30	430.00	129.00
2/23/24	TM	Draft Trustee's commentary for courtesy submission of documents;	.30	430.00	129.00
2/23/24	TM	Multiple telephone conferences with Richard A. Marshack re: discussing approach to Codding hearing on Tuesday and courtesy submission of documents, discussing evidence of funds being available to pay contempt sanctions;	.30	430.00	129.00
2/26/24	TM	Review updated tentative ruling (none) on Codding tomorrow;	.10	430.00	43.00
2/27/24	TM	Telephone conference with Lee Codding and "Angel" from Charles Schwab re: confirming wire transaction details over the telephone with Codding's verbal consent to answer each question;	.20	430.00	86.00
2/27/24	TM	Telephone conference with Richard A. Marshack re: discussing ongoing sanctions proceeding and recap of court proceedings today, possible ramifications if Codding files individual bankruptcy;	.30	430.00	129.00
2/27/24	TM	Appearance at 1:30 p.m. continued hearing on contempt;	.40	430.00	172.00
2/27/24	TM	Draft and revise order requiring Codding's personal appearance;	.10	430.00	43.00
2/27/24	TM	Preparation for and attendance at 11:00 hearing on Codding civil contempt;	1.80	430.00	774.00
2/27/24	BNB	Conference with Tinho Mang re: summary of contempt proceedings (No Charge);	.40	360.00	N/C
2/27/24	BNB	Conference with Tinho Mang re: outcome of February 27 hearing (No Charge);	.10	360.00	N/C
3/08/24	TM	Multiple written correspondences with Lee Codding re: his statement that his Schwab account has been locked;	.20	430.00	86.00
3/08/24	TM	Review tentative ruling for Tuesday's hearing;	.10	430.00	43.00
3/11/24	TM	Written correspondence with Lee Codding re: his further communications about reasons that he has not paid;	.10	430.00	43.00
3/11/24	TM	Telephone conference with Taylor re: response to court's request for update on Codding contempt issue;	.10	430.00	43.00



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Date	Atty	Description	Hours	Rate	Amount
3/12/24	DEH	Court hearing re: status of Codding's contempt and court's issuance of order for bodily detention;	.40	690.00	276.00
3/12/24	LB	Draft order for bodily detention of Leroy Codding;	.60	290.00	174.00
3/12/24	TM	Draft civil contempt and body detention order for Lee Codding;	.60	430.00	258.00
3/12/24	TM	Preparation for and attendance at continued hearing on Codding contempt;	2.40	430.00	1,032.00
3/12/24	TM	Travel time to and from court for hearing (No Charge);	1.00	430.00	N/C
3/12/24	TM	Review 10:52am email correspondence from Lee Codding re: new explanation for status conference and attachment;	.10	430.00	43.00
3/12/24	BNB	Telephone conference with Layla Buchanan re: procedure for bodily detention (No Charge);	.10	360.00	N/C
3/13/24	TM	Telephone conference with Richard A. Marshack re: civil contempt and incarceration of Lee Codding, outcome of hearing, Codding's further excuses, possible forgery and alteration of document;	.40	430.00	172.00
3/13/24	TM	Review and forward order for civil contempt and body detention of Lee Codding;	.10	430.00	43.00
3/13/24	TM	Multiple written correspondences with Lee Codding and Richard A. Marshack re: further adjudication of civil contempt by Codding and his response to court's order for apprehension;	.30	430.00	129.00
3/13/24	TM	Telephone call to chambers re: courtesy notification of Codding's stated intent to appear;	.10	430.00	43.00
3/14/24	DEH	Written correspondence with Queenie Ng re: bodily detention order and status of recovering funds;	.20	690.00	138.00
3/14/24	DEH	Telephone conference with Richard A. Marshack re: contempt hearings (.40); Telephone conference with Richard A. Marshack and Tinho Mang re: same (.70);	1.10	690.00	759.00
3/14/24	TM	Appearance at Zoom hearing (holding date) on Codding contempt;	.40	430.00	172.00
3/14/24	TM	Draft supplement to referral on Codding and submit to UST based on written communications asking for update;	.70	430.00	301.00
3/14/24	TM	Multiple telephone conferences with Richard A. Marshack re: addressing potential fraud on the court;	.30	430.00	129.00
3/14/24	TM	Telephone conference with D. Edward Hays and Richard A. Marshack re: discussing potentially false document from Lee Codding;	.50	430.00	215.00
3/19/24	TM	Written correspondence with Queenie Ng re: response to question about today's hearing;	.10	430.00	43.00

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Date	Atty	Description	Hours	Rate	Amount
3/19/24	TM	Review subsequent order of contempt for Codding and telephone conference with Layla Buchanan re: service required by the court;	.10	430.00	43.00
3/19/24	TM	Review written correspondence from Lee Codding re: ongoing civil contempt and intent to appear on 3/26;	.10	430.00	43.00
3/19/24	TM	Attendance at Zoom hearing for Lee Codding on March 19;	.30	430.00	129.00
3/19/24	TM	Written correspondence with Queenie Ng re: nonappearance of Codding today in response to UST question;	.10	430.00	43.00
3/21/24	DEH	Written correspondence with Ryan Fuxa at Charles Schwab re: subpoena (.10); Telephone conference to Ryan Fuxa re: same (.10);	.20	690.00	138.00
3/22/24	DEH	Telephone conference with Tinho Mang re: contempt hearing and Schwab subpoena;	.20	690.00	138.00
3/22/24	DEH	Telephone conference to Ryan Fuxa re: subpoena and Charles Schwab's inquiry re: whether production of declaration by custodian would obviate need for personal appearance (.10); Draft written correspondence to Ryan Fuxa re: same (.10);	.20	690.00	138.00
3/22/24	TM	Telephone conference with D. Edward Hays re: contempt hearing and Schwab subpoena;	.20	430.00	86.00
3/25/24	TM	Telephone conference with D. Edward Hays re: receipt and review of declaration from Schwab custodian of records, discussing briefly hearing tomorrow;	.20	430.00	86.00
3/26/24	DEH	Review pleadings and prepare outline of facts and arguments to make record during hearing and examine contemnor (1.20); Telephone conference with Richard A. Marshack re: hearing strategy (.20);	1.40	690.00	966.00
3/26/24	DEH	Court appearance at United States Bankruptcy Court, Santa Ana re: continued hearing on status of Codding purging contempt;	2.70	690.00	1,863.00
3/26/24	DEH	Identify and print exhibits for examination of witness at contempt hearing;	.50	690.00	345.00
3/26/24	TM	Telephone conference with D. Edward Hays re: hearing preparation and forward requested email correspondences from Lee Codding;	.10	430.00	43.00
4/02/24	DEH	Review and revise order of further contempt (.20); Written correspondence with Tinho Mang re: same (.10); Written correspondence with US Marshals and Tinho Mang re: executing writ of bodily detention (.20);	.50	740.00	370.00
4/02/24	CM	Revise and finalize order re: further adjudication of civil contempt including bodily detention of Leroy E. Codding (.30); Draft e-mail to D. Edward Hays and Tinho Mang re: same (.10);	.40	340.00	136.00



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Date	Atty	Description	Hours	Rate	Amount
4/02/24	TM	Telephone call to US Marshals Service re: request for information on enforcing body detention order, written correspondence to Anh Tu re: same;	.30	500.00	150.00
4/02/24	TM	Draft proposed order adjudicating Codding in contempt again and requiring appearance;	.50	500.00	250.00
4/03/24	DEH	Review entered order re: further contempt (.10); Written correspondence with Lee Codding, Tinho Mang, and Chanel Mendoza re: same (.10);	.20	740.00	148.00
4/03/24	CM	Review e-mail from Tinho Mang re: order re: further adjudication of civil contempt entered by the court (.10); Draft e-mail to Leroy Codding re: same (.10); Revise and finalize proof of service re: same (.10); (No Charge)	.30	340.00	N/C
4/03/24	TM	Review voicemail from Deputy Rojas at USMS re: response to inquiry on body detention order;	.10	500.00	50.00
4/03/24	TM	Review entered order on civil contempt and forward to staff for service;	.10	500.00	50.00
4/04/24	DEH	Telephone conference with Richard A. Marshack re: Codding's failure and refusal to respond and appear;	.20	740.00	148.00
4/09/24	DEH	Court appearance at United States Bankruptcy Court, Santa Ana re: status conference re: contempt;	1.40	740.00	1,036.00
4/09/24	DEH	Telephone conference with Tinho Mang re: status of US Marshals apprehending Lee Codding to advise court during status hearing;	.10	740.00	74.00
4/09/24	DEH	Written correspondence with Tinho Mang re: preparation of order after status hearing;	.20	740.00	148.00
4/09/24	TM	Telephone conference with D. Edward Hays re: update from US Marshals Service on execution of body detention writ;	.10	500.00	50.00
4/09/24	TM	Draft order setting continued contempt hearing;	.10	500.00	50.00
4/09/24	TM	Observe continued status hearing for Codding contempt (No Charge);	.30	500.00	N/C
4/09/24	TM	Draft subsequent contempt order for Codding;	.20	500.00	100.00
4/11/24	LB	Review and finalize order;	.20	340.00	68.00
5/20/24	TM	Review tentative ruling and written correspondence with D. Edward Hays re: hearing coverage tomorrow;	.10	500.00	50.00
5/21/24	DEH	Court appearance re: status of Codding purging contempt;	.50	740.00	370.00
5/21/24	TM	Observe via telephone the continued contempt hearing for Codding and telephone conference with D. Edward Hays re: same (No Charge);	.20	500.00	N/C

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Date	Atty	Description	Hours	Rate	Amount
5/21/24	TM	Draft order continuing contempt hearing and written correspondence with D. Edward Hays re: same;	.20	500.00	100.00
5/24/24	LB	Review and finalize order re: continued contempt;	.10	340.00	34.00
5/28/24	DEH	Telephone conference with Richard A. Marshack and Pam Kraus re: motion for order designating unadministered asset, final report, distributing estate assets, NDR, but not seeking to close case pending Codding purging contempt;	.20	740.00	148.00
5/30/24	LB	Draft service of continued OSC hearing to Lee Codding;	.10	340.00	34.00
6/19/24	TM	Telephone conference with Richard A. Marshack re: inactivity from US Marshals;	.10	500.00	50.00
6/26/24	LB	Conference with court clerk re: status of order to show cause re: contempt of Leroy Codding;	.10	340.00	34.00
6/26/24	TM	Telephone conference with Taylor Brown Duncan re: request from court for any update on Lee Codding;	.10	500.00	50.00
6/26/24	TM	Telephone conference with Richard A. Marshack and Jonathan Cabanas at USMS re: body detention order status and written correspondence to Jonathan Cabanas re: details of same;	.60	500.00	300.00
6/26/24	TM	Telephone conference with Taylor Brown Duncan re: status update on contempt hearing as requested by the court;	.10	500.00	50.00
7/02/24	TM	Attendance at Zoom hearing on Codding order to show cause;	1.60	500.00	800.00
8/12/24	LB	Draft order on continued OSC hearing of Leroy Codding;	.40	340.00	136.00
8/13/24	TM	Review and revise order setting continued status conference on contempt;	.10	500.00	50.00
8/19/24	TM	Multiple telephone conferences with Richard A. Marshack and deputy marshals Cabanas and voicemail for Michael Picou re: attempting to get status update on body detention order;	.40	500.00	200.00
8/19/24	TM	Written correspondence with Michael Picou re: information for the Marshals to apprehend Codding and search for driver's license as well, telephone conference with Chantaa Arnold re: same;	.30	500.00	150.00
8/23/24	TM	Written correspondence with Michael Picou re: USMS request for additional addresses;	.20	500.00	100.00
9/09/24	LB	Review and finalize status report;	.20	340.00	68.00
9/09/24	LB	Review and finalize status report re: civil contempt;	.20	340.00	68.00
9/09/24	TM	Draft status report on contempt;	.60	500.00	300.00
9/10/24	LB	Draft order following September 10th hearing;	.30	340.00	102.00

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Date	Atty	Description	Hours	Rate	Amount
9/10/24	TM	Written correspondence to Taylor Brown-Duncan re: contacts with US Marshals;	.20	500.00	100.00
9/10/24	TM	Preparation for and attendance at Zoom hearing on continued status conference for contempt;	.70	500.00	350.00
9/19/24	TM	Review email re: anonymous tip about location of Codding and forward same via email to Deputy Marshal Picou;	.10	500.00	50.00
9/20/24	TM	Review and revise order continuing contempt status conference to November;	.10	500.00	50.00
11/07/24	LB	Review and finalize status report;	.20	340.00	68.00
11/07/24	TM	Draft status report for 11-12 status conference;	.50	500.00	250.00
11/07/24	TM	Written correspondence to Deputy Marshal Picou re: requesting update;	.10	500.00	50.00
11/07/24	TM	Leave voicemail for US Marshal Civil Division (Sacramento) re: requesting callback and update on body detention writ;	.10	500.00	50.00
11/08/24	LB	Draft service of order continuing order to show cause hearing pursuant to Court's order;	.30	340.00	102.00
11/08/24	TM	Review order vacating and continuing status conference and directing us to serve Codding and Marshals;	.20	500.00	100.00
11/11/24	DEH	Telephone conference with Richard A. Marshack and Pam Kraus re: whether to retain private investigator;	.20	740.00	148.00
11/13/24	TM	Telephone conference with Deputy Gorczynski re: update from USMS - Eastern Cal. and information on Codding in Lake Tahoe (.20); Note to file (.10);	.30	500.00	150.00
12/28/24	TM	Written correspondence with anonymous tipster re: Codding location and further information on same;	.20	500.00	100.00
1/06/25	TM	Written correspondence to Deputy Marshal Picou re: request status update on Codding;	.10	500.00	50.00
1/22/25	TM	Telephone conference with Deputy Marshal Picou re: efforts to locate Codding at Orange address;	.10	500.00	50.00
2/11/25	LB	Draft status report re: contempt hearing;	.10	340.00	34.00
2/11/25	LB	Review and finalize notice of continue status hearing;	.30	340.00	102.00
2/11/25	TM	Draft status report for continued status hearing on 2-18;	.60	500.00	300.00
2/11/25	TM	Telephone conference with Richard A. Marshack re: report & recommendation;	.50	500.00	250.00
2/21/25	TM	Telephone conference with Frank Tovar re: information provided about Codding's whereabouts;	.30	500.00	150.00

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Date	Atty	Description	Hours	Rate	Amount
2/21/25	TM	Written correspondence to Deputy Marshal Picou re: updated information obtained on Codding's whereabouts;	.10	500.00	50.00
2/27/25	TM	Written correspondence with in-house counsel with Spearmint Rhino Properties re: coordinating access to Mr. Codding;	.20	500.00	100.00
3/03/25	TM	Telephone conference with Richard A. Marshack re: contacting Marshals about Lee Codding and landlord's involvement;	.30	500.00	150.00
3/06/25	TM	Telephone conference with Richard A. Marshack re: status of detention for Lee Codding;	.10	500.00	50.00
3/07/25	TM	Telephone conference with Taylor Brown Duncan re: court setting hearing on Codding detention;	.10	500.00	50.00
3/07/25	TM	Telephone conference with Richard A. Marshack and Deputy Marshal Picou re: successful apprehension of Codding;	.20	500.00	100.00
3/07/25	TM	Review updated tentative ruling for hearing on Tuesday;	.10	500.00	50.00
3/10/25	TM	Telephone conference with Richard A. Marshack re: hearing tomorrow and preparation for hearing;	.20	500.00	100.00
3/11/25	TM	Telephone conference with Rachael Acrey re: discussing hearing today and obtaining further information to track Codding;	.20	500.00	100.00
3/11/25	TM	Draft further contempt order following 3/11 hearing;	.80	500.00	400.00
3/11/25	TM	Preparation for and attendance at hearing on Codding contempt (he's in custody);	2.90	500.00	1,450.00
3/11/25	TM	Travel time to and from court (No Charge);	1.00	500.00	N/C
3/11/25	TM	Multiple written correspondences with Lee Codding re: providing shared location as agreed in court;	.20	500.00	100.00
3/11/25	TM	Telephone conference with D. Edward Hays and Richard A. Marshack re: outcome of hearing today;	.20	500.00	100.00
3/11/25	TM	Review court's order for release and imposing additional sanctions;	.20	500.00	100.00
3/12/25	TM	Draft notice of compliance with location sharing;	.30	500.00	150.00
3/12/25	TM	Multiple written correspondences with Lee Codding;	.30	500.00	150.00
<b>Sub-Total Fees:</b>			<b>250.40</b>		<b>\$ 102,473.00</b>

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**1 Asset Analysis and Recovery**

Date	Atty	Description	Hours	Rate	Amount
5/31/22	TM	Written correspondence with Michael Gomez re: surcharge proceeds and telephone conference with Richard A. Marshack re: same;	.20	390.00	78.00
6/08/22	TM	Written correspondence with Richard A. Marshack and David A. Wood re: analysis of avoidance claims;	.20	390.00	78.00
6/21/22	TM	Written correspondence with Michael Gomez re: timing on surcharge payment to estate;	.10	390.00	39.00
7/18/22	TM	Written correspondence with Pam Kraus re: insurance on properties;	.10	390.00	39.00
8/02/22	TM	Review written correspondence from Michael Gomez re: cancellation of purchase agreement with debtor and request for payment of surcharge funds;	.10	390.00	39.00
10/11/22	TM	Draft FOIA request for TTB documents suggested by Erich Russell;	.20	390.00	78.00
11/14/22	LB	Research UCC filings;	.20	260.00	52.00
<b>Sub-Total Fees:</b>			<b>1.10</b>		<b>\$ 403.00</b>

**10 Litigation**

Date	Atty	Description	Hours	Rate	Amount
3/24/22	KAT	Telephone conference with D. Edward Hays and Richard A. Marshack re: state court litigation (.40);	.40	550.00	220.00
4/15/22	TM	Review forwarded written correspondence from insurance company to Trustee and written correspondence to Roger Raphael and others re: contact about pending state court litigation;	.20	390.00	78.00
4/15/22	TM	Review correspondence and attachments from Kari Ley re: ownership of Rabbit Ridge insurance claim;	.20	390.00	78.00
4/18/22	TM	Review and analyze complaint forwarded from Roger Raphael and telephone conference with Roger Raphael re: same;	.40	390.00	156.00
5/25/22	DAW	Draft and send e-mail correspondence to Trustee and Tinho Mang re: confirmation that there are no fraudulent transfers to go after;	.10	490.00	49.00
5/25/22	DAW	Review and analyze multiple further e-mail correspondence from Trustee and Tinho Mang re: avoidance analysis;	.20	490.00	98.00

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Date	Atty	Description	Hours	Rate	Amount
6/17/22	TM	Telephone conference with Paul Greco re: settlement discussions for unpaid labor from Nevarez;	.40	390.00	156.00
7/07/22	TM	Telephone conference with Debbie from San Luis Obispo District Attorney's office re: bankruptcy and possible payment to Adler Belmont;	.20	390.00	78.00
8/23/22	TM	Review and respond to written correspondence from Rodney Meeks requesting status update on payment to farm labor;	.20	390.00	78.00
9/13/22	TM	Telephone conference with Richard A. Marshack re: settlement authority with post-conversion farm laborers;	.20	390.00	78.00
9/15/22	TM	Begin drafting settlement letter to farm labor;	.80	390.00	312.00
5/16/23	TM	Telephone conference with Gerrick Warrington re: objection from FCW to stipulated order on contempt;	.50	430.00	215.00
5/18/23	TM	Draft stipulation with FCW re: resolving objection to stipulation and written correspondence to Gerrick Warrington and Michael Gomez re: same;	.40	430.00	172.00
5/18/23	TM	Telephone conference with Richard A. Marshack and Michael Gomez re: resolving FCW objection to stipulation;	.20	430.00	86.00
5/22/23	TM	Written correspondence with Gerrick Warrington re: additional comments and revisions to stipulation and order re: contempt, make revisions, circulate new clean copy;	.20	430.00	86.00
5/24/23	DEH	Telephone conference with Richard A. Marshack and Tinho Mang re: resolving FCW objection through 9019 motion;	.40	690.00	276.00
5/24/23	TM	Telephone conference with Richard A. Marshack re: stipulation with Farm Credit;	.10	430.00	43.00
5/24/23	TM	Revise and update stipulation with FCW to resolve dispute over sanctions proceeds;	.40	430.00	172.00
5/24/23	TM	Telephone conference with Richard A. Marshack and D. Edward Hays re: resolving FCW objection through 9019 motion;	.40	430.00	172.00
5/31/23	TM	Telephone conference with Gerrick Warrington re: further proposes revisions to stipulation to resolve AgWest's objection;	.20	430.00	86.00
5/31/23	TM	Review further revised stipulation from Gerrick Warrington and written correspondence with same re: payment by Coddling may moot certain added paragraphs;	.20	430.00	86.00
6/01/23	TM	Telephone conference with Richard A. Marshack re: no payment by Coddling today and stipulation with FCW;	.10	430.00	43.00
6/01/23	TM	Further revise and update stipulation with FCW and written correspondence with Gerrick Warrington and Michael Gomez re: same, leave voicemail for Gerrick Warrington re: same;	.20	430.00	86.00

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Date	Atty	Description	Hours	Rate	Amount
6/02/23	LB	Review and finalize stipulation with FCW on Civil Contempt (.10); Review and finalize proposed order re: same (.10);	.20	290.00	58.00
6/02/23	TM	Telephone conference with Allison Murray re: notice of lodgment for order on stipulation;	.10	430.00	43.00
6/16/23	TM	Written correspondence with Lee Codding re: nonpayment of stipulated sanctions;	.20	430.00	86.00
8/16/23	TM	Detailed written correspondence to Michael Gomez and Gerrick Warrington re: settlement proposal on crop proceeds and following up on May 2023 correspondence re: same;	.40	430.00	172.00
8/21/23	TM	Telephone conference with Michael Gomez re: settlement negotiations over division of crop proceeds;	.50	430.00	215.00
8/21/23	TM	Telephone conference with Richard A. Marshack re: settlement negotiations with labor and bank;	.20	430.00	86.00
10/30/23	LB	Draft motion to approve Azcona Agreement;	.50	290.00	145.00
11/09/23	LB	Draft notice of motion to approve Azcona Agreement (.40); Review and finalize motion to approve Azcona Agreement (.70);	1.10	290.00	319.00
11/09/23	TM	Written correspondence with Michael Gomez re: settlement negotiations for division of remaining proceeds;	.20	430.00	86.00
11/09/23	TM	Draft and revise notice of compromise motion;	.10	430.00	43.00
11/09/23	TM	Telephone conference with Richard A. Marshack and Michael Gomez re: settlement negotiations on division of crop proceeds;	.30	430.00	129.00
12/04/23	LB	Review and finalize declaration re: no hearing on the motion to approve Azcona Agreement (.30); Review and finalize order re: same (.10);	.40	290.00	116.00
12/04/23	TM	Telephone conference with Richard A. Marshack re: discussing progress of Codding contempt compliance, discussing settlement terms between FCW and Trustee re: reconciliation of payments;	.40	430.00	172.00
<b>Sub-Total Fees:</b>			<b>11.20</b>		<b>\$ 4,574.00</b>

**2 Asset Disposition**

Date	Atty	Description	Hours	Rate	Amount
4/04/22	TM	Begin draft and research motion to authorize interim disbursements;	2.90	390.00	1,131.00



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Date	Atty	Description	Hours	Rate	Amount
4/05/22	DEH	Review and revise motion to approve interim distributions from carved-out funds (.40); Written correspondence with Richard A. Marshack and Tinho Mang re: same (.20);	.60	680.00	408.00
4/05/22	LB	Conference with Tinho Mang re: preparation of motion for interim disbursement (.10); Review and finalize motion and declaration of Richard A. Marshack in support (.20); Draft request for judicial notice (.20); Preparation of evidence in support of motion (.20); Draft notice of motion (.20); Draft supplemental notice (.10);	1.00	260.00	260.00
4/05/22	TM	Finish drafting motion to approve interim disbursements;	1.10	390.00	429.00
4/05/22	TM	Telephone conference with Pam Kraus re: review of disbursement motion and revise accordingly;	.10	390.00	39.00
4/05/22	TM	Draft and revise notice of interim disbursement motion;	.10	390.00	39.00
4/06/22	LB	Conference with Richard A. Marshack re: motion for interim disbursement of funds (.10); Conference with Tinho Mang re: revisions to same (.10); Review and finalize motion and notice of motion for interim disbursement (.20);	.40	260.00	104.00
4/06/22	TM	Telephone conference with Richard A. Marshack re: review and revision of interim distribution motion and revise accordingly;	.40	390.00	156.00
4/18/22	KAT	Telephone conference Kevin Otus re: offers on San Marcos and Texas Road (.10);	.10	550.00	55.00
5/05/22	LB	Draft order granting cash disbursement motion;	.20	260.00	52.00
5/09/22	TM	Written correspondence with D. Edward Hays, Pam Kraus, and Layla Buchanan re: lodgment of disbursement and fee application order;	.10	390.00	39.00
6/16/22	TM	Telephone conference with Richard A. Marshack and Pam Kraus re: foreclosure and redemption letter from Farm Credit;	.20	390.00	78.00
6/16/22	TM	Review written correspondence from Michael Gomez re: foreclosure and redemption for San Marcos;	.30	390.00	117.00
7/18/22	TM	Written correspondence with Michael Gomez re: offer to purchase San Marcos and Texas Road from Coddling;	.20	390.00	78.00
8/04/22	TM	Written correspondence with Richard A. Marshack re: abandonment of personal property assets and allegations from Erich Russell re: grape theft;	.20	390.00	78.00
9/19/22	TM	Telephone conference with Pam Kraus re: possibility of distributions to creditors and case economics;	.20	390.00	78.00
5/23/23	TM	Telephone conference with John Henry re: interested party for San Marcos property, written correspondence to Michael Gomez re: same;	.20	430.00	86.00



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Date	Atty	Description	Hours	Rate	Amount
7/10/23	TM	Multiple written correspondences with Don Daniels re: offers from WarRoom to purchase estate's interest or Russell's interest in intellectual property marks;	.20	430.00	86.00
7/10/23	TM	Telephone conference with Richard A. Marshack re: sale negotiations for the estate's interest, if any, in Rabbit Ridge marks;	.20	430.00	86.00
7/10/23	TM	Telephone conference with Don Daniels re: offer to purchase estate's interest in trademark;	.20	430.00	86.00
11/09/23	TM	Draft collateral division stipulation with FCW and written correspondence with Richard A. Marshack re: same;	1.60	430.00	688.00
<b>Sub-Total Fees:</b>			<b>10.50</b>		<b>\$ 4,173.00</b>

**3 Business Operations**

Date	Atty	Description	Hours	Rate	Amount
6/17/22	TM	Review written correspondence from Pam Kraus re: contact from unpaid laborer and telephone conference with Rodney Meeks re: unpaid harvesting laborers owed 94k;	.30	390.00	117.00
6/17/22	TM	Telephone conference with Richard A. Marshack re: unpaid harvesting laborers and written correspondence to Rob Goe re: same;	.20	390.00	78.00
6/20/22	LB	Review of documents related to grower reports and labor related from Emerald Valley Labor, Azcona Harvesting and SoMoCo Labor Supply;	.20	260.00	52.00
6/20/22	TM	Review, analyze, and summarize invoices and spreadsheets from three harvesting companies and multiple written correspondences with Betsy Roth re: clarifying questions;	1.90	390.00	741.00
6/20/22	TM	Multiple telephone conferences with Betsy Roth re: unpaid harvesting vendor;	.30	390.00	117.00
6/20/22	TM	Multiple telephone conferences with Richard A. Marshack re: review and analysis of harvester invoices and grower reports, response;	.30	390.00	117.00
9/19/22	TM	Written correspondence with Lori Ensley re: additional farming invoices and basis from each invoice for farm or non-farm work;	.10	390.00	39.00
10/17/22	TM	Finish drafting settlement letter to farm laborers and written correspondence to Richard A. Marshack re: approval of same;	1.40	390.00	546.00
10/18/22	TM	Telephone conference with Richard A. Marshack re: revision of labor settlement offer and revise same;	.50	390.00	195.00

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Date	Atty	Description	Hours	Rate	Amount
10/25/22	TM	Telephone conference with Richard A. Marshack re: settlement negotiations with laborers;	.20	390.00	78.00
10/25/22	TM	Telephone conference with Paul Moncrief re: settlement negotiations for farm labor;	.50	390.00	195.00
11/15/22	TM	Review Awalt invoice and written correspondence with Awalt re: clarification on same;	.20	390.00	78.00
11/15/22	TM	Telephone conference with Richard A. Marshack re: Awalt invoices and charges;	.10	390.00	39.00
11/15/22	TM	Written correspondence to Richard A. Marshack re: Awalt invoices and explanation;	.20	390.00	78.00
11/23/22	TM	Review signed stipulation from Kirk Awalt;	.10	390.00	39.00
11/28/22	TM	Telephone conference with and written correspondence with Pam Kraus re: payment of Awalt invoices;	.20	390.00	78.00
1/05/23	TM	Multiple written correspondences with Rodney Meeks re: settlement discussions;	.20	390.00	78.00
5/17/23	TM	Telephone conference with Richard A. Marshack and Pam Kraus re: segregated grape crop proceeds;	.10	430.00	43.00
5/17/23	TM	Compile explanation and accounting for crop sales and written correspondence to Gerrick Warrington and Michael Gomez re: same;	1.60	430.00	688.00
6/27/23	TM	Telephone conference with Lisa Stanley from Skikos Trucking re: unpaid trucking/shipping company by Lee Coddling and request for invoices and bills of lading;	.20	430.00	86.00
7/06/23	TM	Telephone conference with Nicholas Azcona and written correspondence with Nicholas Azcona re: request from laborer for payment update;	.10	430.00	43.00
7/06/23	TM	Written correspondence to Nick Azcona re: Trustee's settlement offer;	.20	430.00	86.00
7/11/23	TM	Written correspondence with Betsy Roth re: negotiations with labor contractor for partial payment;	.10	430.00	43.00
8/11/23	TM	Telephone conference with Richard A. Marshack re: settlement negotiations with Azcona and making distributions;	.30	430.00	129.00
10/25/23	TM	Review renewed settlement offer from Rodney Meeks on behalf of Azcona group re: settlement of labor invoices, calculate insolvency issue, telephone conferences with Pam Kraus re: same;	1.00	430.00	430.00
10/25/23	TM	Telephone conference with Richard A. Marshack re: settlement negotiation with Azcona and written correspondence to Rodney Meeks, Betsy Roth, and Nicholas Azcona re: rejection of counter-offer and reiterated counter-offer;	.20	430.00	86.00

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Date	Atty	Description	Hours	Rate	Amount
10/26/23	TM	Multiple written correspondences with Rodney Meeks and Richard A. Marshack re: settlement negotiations for labor invoices;	.20	430.00	86.00
10/27/23	TM	Telephone conference with Richard A. Marshack re: filing motion to approve settlement with laborers and addressing potential objection by Farm Credit;	.20	430.00	86.00
10/27/23	TM	Begin drafting settlement agreement with Azcona group;	1.00	430.00	430.00
10/29/23	TM	Finish drafting settlement agreement with Azcona and written correspondence to Richard A. Marshack re: review of same;	.90	430.00	387.00
10/30/23	TM	Review suggested revisions from Richard A. Marshack to settlement agreement, revise same, circulate to Azcona;	.30	430.00	129.00
11/02/23	TM	Written correspondence to Michael Gomez and Gerrick Warrington re: settlement of labor invoices;	.10	430.00	43.00
11/06/23	TM	Finish draft and research motion to approve compromise with Azcona;	3.70	430.00	1,591.00
12/01/23	TM	Review Form 2 and revise stipulation with FCW for distribution of proceeds, written correspondence to Pam Kraus re: proposed reconciliation;	.50	430.00	215.00
12/04/23	TM	Draft and revise order granting Azcona settlement motion and declaration of non-opposition;	.50	430.00	215.00
12/05/23	TM	Review order granting settlement with labor and written correspondence and telephone conference with Rodney Meeks re: sending checks;	.20	430.00	86.00
<b>Sub-Total Fees:</b>			<b>18.30</b>		<b>\$ 7,567.00</b>

**4 Case Administration**

Date	Atty	Description	Hours	Rate	Amount
4/07/22	TM	Draft annual report for Pam Kraus;	.70	390.00	273.00
4/18/22	DAW	Conference with Trustee re: ongoing negotiations with Rob Goe counsel for Lee Coddling (No Charge);	.20	490.00	N/C
4/19/22	TM	Telephone conference with Richard A. Marshack and Pam Kraus re: case report and memorandum re: outstanding issues;	.40	390.00	156.00
4/20/22	TM	Multiple written correspondences with Pam Kraus and Don Fife re: FTB tax claim issue;	.20	390.00	78.00

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Date	Atty	Description	Hours	Rate	Amount
4/27/22	TM	Telephone conference with Richard A. Marshack and Pam Kraus re: interim fee application and analysis of distributions (No Charge);	.30	390.00	N/C
5/03/22	CVH	E-mails with Richard Marshack, Tinh Mang, and Pam Kraus case status (.20) (No Charge);	.20	490.00	N/C
5/06/22	TM	Draft and revise interim fee order and order approving cash disbursements, written correspondence with D. Edward Hays and Pam Kraus re: same;	.40	390.00	156.00
9/09/22	TM	Telephone conference with Pam Kraus re: funds on hand for crop proceeds (No Charge);	.10	390.00	N/C
9/15/22	TM	Telephone conference with Richard A. Marshack re: strategy to resolve outstanding issues;	.50	390.00	195.00
12/21/22	TM	Telephone conference with Chantaal Arnold re: discovery and obtaining Trustee's records (No Charge);	.20	390.00	N/C
12/22/22	TM	Telephone conference with Richard A. Marshack re: collateral and surcharge issues;	.20	390.00	78.00
2/19/23	PK	Draft and save rate change notice (No Charge);	.30	280.00	N/C
2/22/23	TM	Written correspondence with David A. Wood and Pam Kraus re: case administration status and disposition of collateral funds (No Charge);	.20	390.00	N/C
2/23/23	PK	Revise notice of change of hourly rates (No Charge);	.10	280.00	N/C
4/17/23	TM	Draft annual status case report for Pam Kraus;	.30	430.00	129.00
5/15/23	TM	Telephone conference with Pam Kraus re: distribution and final administration issues;	.10	430.00	43.00
5/22/23	TM	Telephone conference with Richard A. Marshack and Pam Kraus re: discussing Chapter 7 administrative expenses and timing;	.10	430.00	43.00
8/28/23	TM	Telephone conference with Richard A. Marshack re: negotiations with labor and what remains to be administered prior to case closure;	.10	430.00	43.00
8/28/23	TM	Multiple written correspondences with David A. Wood, Richard A. Marshack, and Pam Kraus re: funds payable to interim administrative creditors and closing case (No Charge);	.20	430.00	N/C
10/30/23	TM	Telephone conference with Richard A. Marshack re: settlement with Azcona and status of payment from Codding;	.10	430.00	43.00
12/05/23	TM	Telephone conference with Pam Kraus re: accounting and reconciliation (No Charge);	.20	430.00	N/C
2/20/24	PK	Draft notice of change in hourly rates (No Charge);	.30	290.00	N/C
5/08/24	TM	Conference with Andrea Linares re: question on calendaring status conference (No Charge);	.10	500.00	N/C

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Date	Atty	Description	Hours	Rate	Amount
12/17/24	DEH	Telephone conference with Pam Kraus re: motion to designate unadministered asset and strategy and timing for final report;	.20	740.00	148.00
2/16/25	PK	Draft rate change notice (No Charge);	.20	340.00	N/C
2/17/25	PK	Profile and save rate change notice (No Charge);	.10	340.00	N/C
2/19/25	PK	Revise and finalize notice of increased hourly rates (No Charge);	.30	340.00	N/C
<b>Sub-Total Fees:</b>			<b>6.30</b>		<b>\$ 1,385.00</b>

**5 Claims Administration and Objections**

Date	Atty	Description	Hours	Rate	Amount
5/26/22	TM	Written correspondence with Michael Gomez re: foreclosure and surcharge distributions, status of crop proceed reconciliations;	.20	390.00	78.00
6/07/22	TM	Written correspondence with Paul Greco re: unpaid laborer claim from Nevarez;	.20	390.00	78.00
9/09/22	TM	Written correspondence with Michael Gomez re: funds on hand for secured creditor;	.10	390.00	39.00
11/22/22	TM	Draft stipulation to allow Awalt payment;	.40	390.00	156.00
12/08/22	TM	Draft and revise order for payment to Awalt;	.10	390.00	39.00
8/22/23	LB	Draft objection to claim of Azcuna and declaration of Tinho Mang in support of same;	.40	290.00	116.00
9/05/23	TM	Draft objection to informal claim by Azcona;	5.90	430.00	2,537.00
<b>Sub-Total Fees:</b>			<b>7.30</b>		<b>\$ 3,043.00</b>

**7 Fee/Employment Applications**

Date	Atty	Description	Hours	Rate	Amount
4/01/22	LB	Review case file (.10); Begin drafting first interim fee application and supporting declaration (.30);	.40	260.00	104.00
4/06/22	TM	Review and annotate bill for interim fee application (No Charge);	2.30	390.00	N/C

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Date	Atty	Description	Hours	Rate	Amount
4/07/22	LB	Draft first interim fee application and declaration of Tinho Mang in support of same;	.90	260.00	234.00
4/13/22	TM	Begin drafting first interim fee application;	3.30	390.00	1,287.00
4/14/22	LB	Conference with Tinho Mang re: revisions to fee application (.10); Review and finalize fee application and declaration of Tinho Mang in support (.70); Preparation of evidence in support of fee application (.20); Draft notice of hearing on fee application (.20); Draft supplemental notice of hearing (.10);	1.30	260.00	338.00
4/14/22	TM	Finish drafting first interim fee application;	1.20	390.00	468.00
4/14/22	TM	Draft and revise notice of fee application hearing;	.10	390.00	39.00
5/04/22	TM	Review tentative rulings on cash disbursement motion and first interim fee application;	.10	390.00	39.00
5/05/22	LB	Draft order granting Marshack Hays first interim fee application;	.40	260.00	104.00
5/09/22	DEH	Review and revise order granting first interim fee application and order granting motion to disburse proceeds;	.20	680.00	136.00
5/16/22	LB	Correspondence to D. Edward Hays re: status of entered order granting fee application;	.10	260.00	26.00
5/18/22	LB	Conference with Court clerk re: status of entry of order granting fee application;	.10	260.00	26.00
5/31/22	DAW	Conference with Pam Kraus re: status of the fee order and checks therewith (.20); Review and respond to multiple e-mail correspondence from Pam Kraus and Tinho Mang re: same (.20); (No Charge)	.40	490.00	N/C
5/31/22	TM	Written correspondence with Pam Kraus re: lack of interim fee order (No Charge);	.10	390.00	N/C
6/03/22	TM	Telephone conference with Richard A. Marshack re: court correspondence on interim fee application and draft supplement to interim fee application;	1.00	390.00	390.00
6/03/22	TM	Telephone conference with Richard A. Marshack re: review and revision of supplement;	.20	390.00	78.00
6/10/22	DAW	Review and analyze order entered by the Court approving the fee application for Marshack Hays (.10); Draft and send e-mail correspondence to Pam Kraus and Trustee re: same (.10); (No Charge)	.20	490.00	N/C
6/10/22	TM	Review interim fee order and written correspondence to Pam Kraus and Richard A. Marshack re: same;	.10	390.00	39.00
2/20/25	LB	Conference with Tinho Mang re: preparation of final fee application;	.10	340.00	34.00
3/06/25	TM	Reviewing invoice for fee application (No Charge);	1.80	500.00	N/C

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Date	Atty	Description	Hours	Rate	Amount
3/12/25	TM	Finish reviewing and annotating invoice for fee application (No Charge);	3.70	500.00	N/C
3/13/25	LB	Draft second and final fee application;	.80	340.00	272.00
<b>Sub-Total Fees:</b>			<b>18.80</b>		<b>\$ 3,614.00</b>

**8 Fee/Employment Objections**

Date	Atty	Description	Hours	Rate	Amount
4/18/22	TM	Written correspondence with Queenie Ng re: request from UST for information to review interim fee application (No Charge);	.10	390.00	N/C
4/19/22	TM	Multiple written correspondences with Queenie Ng re: UST requests re: fee application (No Charge);	.10	390.00	N/C
4/28/22	DEH	Telephone conference with Tinho Mang re: agreement to resolve U.S. Trustee objections to fees (No Charge);	.20	680.00	N/C
4/28/22	TM	Written correspondence with Queenie Ng and telephone conference with D. Edward Hays re: requested reduction to fee request for interim fee application (No Charge);	.10	390.00	N/C
4/28/22	TM	Draft stipulation for fee reduction and written correspondence with Queenie Ng re: same (No Charge);	.40	390.00	N/C
4/28/22	TM	Draft and revise order approving stipulation for fee reduction (No Charge);	.10	390.00	N/C
<b>Sub-Total Fees:</b>			<b>1.00</b>		<b>N/C</b>

**TOTAL FEES**

**\$ 127,546.00**

**EXHIBIT 4**



MARSHACK HAYS WOOD LLP

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**FEE RECAP BY TASK CODE**

<b>Task</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
.1	SLO Property Tax negotiations	.60	314.00
.2	Contempt Proceedings	250.40	102,473.00
1	Asset Analysis and Recovery	1.10	403.00
10	Litigation	11.20	4,574.00
2	Asset Disposition	10.50	4,173.00
3	Business Operations	18.30	7,567.00
4	Case Administration	6.30	1,385.00
5	Claims Administration and Objections	7.30	3,043.00
7	Fee/Employment Applications	18.80	3,614.00
8	Fee/Employment Objections	1.00	.00
	Sub-Total of Fees:	325.50	\$ 127,546.00

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**FEE RECAP BY ATTORNEY**

Name	Atty	Staff Level	N/C Hours	Billed Hours	Rate	Billed Amount
Pamela Kraus	PK	Paralegal	1.30	.00	.00	.00
Chad V. Haes	CVH	Partner	.50	.00	.00	.00
Bradford N. Barnhardt	BNB	Associate	1.00	.00	.00	.00
Layla Buchanan	LB	Paralegal	.40	33.60	277.38	9,320.00
Cynthia Bastida	CB	Paralegal	.00	.60	290.00	174.00
Chanel Mendoza	CM	Paralegal	.50	2.20	299.09	658.00
Tinho Mang	TM	Associate	13.20	247.20	414.86	102,553.00
David A. Wood	DAW	Partner	1.00	.50	490.00	245.00
Kristine A. Thagard	KAT	Of Counsel	.00	1.00	550.00	550.00
D. Edward Hays	DEH	Partner	2.30	20.20	695.35	14,046.00
<b>Total</b>			<b>20.20</b>	<b>305.30</b>		<b>\$ 127,546.00</b>

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**FEE RECAP BY MONTH**

**D. Edward Hays**

04/2022	2.80	1,904.00
05/2022	.20	136.00
06/2022	.70	476.00
07/2022	2.90	1,972.00
11/2022	.30	204.00
12/2022	.40	272.00
01/2023	.20	136.00
02/2023	.20	136.00
04/2023	.20	138.00
05/2023	.40	276.00
10/2023	.30	207.00
12/2023	.70	483.00
01/2024	.30	207.00
03/2024	6.90	4,761.00
04/2024	2.60	1,924.00
05/2024	.70	518.00
11/2024	.20	148.00
12/2024	.20	148.00
<b>Subtotal for D. Edward Hays</b>	<b>20.20</b>	<b>\$ 14,046.00</b>

**David A. Wood**

05/2022	.30	147.00
11/2022	.20	98.00
<b>Subtotal for David A. Wood</b>	<b>.50</b>	<b>\$ 245.00</b>

**Kristine A. Thagard**

03/2022	.40	220.00
04/2022	.60	330.00
<b>Subtotal for Kristine A. Thagard</b>	<b>1.00</b>	<b>\$ 550.00</b>

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**Tinho Mang**

04/2022	19.40	7,566.00
05/2022	5.30	2,067.00
06/2022	16.00	6,240.00
07/2022	8.90	3,471.00
08/2022	.50	195.00
09/2022	2.30	897.00
10/2022	8.90	3,471.00
11/2022	9.90	3,861.00
12/2022	15.00	5,850.00
01/2023	6.70	2,613.00
02/2023	11.80	4,602.00
03/2023	17.40	6,786.00
04/2023	20.90	8,987.00
05/2023	30.50	13,115.00
06/2023	6.10	2,623.00
07/2023	1.70	731.00
08/2023	1.80	774.00
09/2023	8.00	3,440.00
10/2023	8.40	3,612.00
11/2023	7.80	3,354.00
12/2023	1.90	817.00
01/2024	7.80	3,354.00
02/2024	6.30	2,709.00
03/2024	7.60	3,268.00
04/2024	1.40	700.00
05/2024	.30	150.00
06/2024	.90	450.00
07/2024	1.60	800.00
08/2024	1.00	500.00
09/2024	1.70	850.00
11/2024	1.20	600.00
12/2024	.20	100.00
01/2025	.20	100.00
02/2025	1.70	850.00
03/2025	6.10	3,050.00
<b>Subtotal for Tinho Mang</b>	<b>247.20</b>	<b>\$ 102,553.00</b>

**Chanel Mendoza**

09/2023	.70	203.00
11/2023	.50	145.00
01/2024	.60	174.00
04/2024	.40	136.00
<b>Subtotal for Chanel Mendoza</b>	<b>2.20</b>	<b>\$ 658.00</b>

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**Layla Buchanan**

04/2022	6.60	1,716.00
05/2022	.80	208.00
06/2022	.20	52.00
07/2022	1.20	312.00
10/2022	.60	156.00
11/2022	3.10	806.00
12/2022	.10	26.00
01/2023	.90	234.00
03/2023	6.30	1,638.00
04/2023	4.40	1,276.00
06/2023	1.10	319.00
07/2023	.40	116.00
08/2023	.60	174.00
10/2023	.70	203.00
11/2023	1.30	377.00
12/2023	.70	203.00
01/2024	.60	174.00
03/2024	.60	174.00
04/2024	.20	68.00
05/2024	.20	68.00
06/2024	.10	34.00
08/2024	.40	136.00
09/2024	.70	238.00
11/2024	.50	170.00
02/2025	.50	170.00
03/2025	.80	272.00
<b>Subtotal for Layla Buchanan</b>	<b>33.60</b>	<b>\$ 9,320.00</b>

**Cynthia Bastida**

09/2023	.60	174.00
<b>Subtotal for Cynthia Bastida</b>	<b>.60</b>	<b>\$ 174.00</b>

**EXHIBIT 5**

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**DISBURSEMENTS**

**E101 Copying**

Date	Description	Amount
4/05/22	Document Copies re: stipulation re: extension of time for responsive pleading from Leroy Lee Codding to motion for issuance of order to show cause re: civil contempt	.40
4/06/22	Document Copies re: Trustee's motion to authorize cash disbursements, notice of motion, supplemental zoom notice of hearing	18.00
4/14/22	Document Copies re: first interim fee application filed by Marshack Hays LLP, notice of application, supplemental zoom notice of hearing	23.70
4/19/22	Document Copies re: second stipulation re: extension of time for responsive pleading from Leroy Lee Codding to motion for issuance of OSC re: civil contempt	.40
4/28/22	Document Copies re: stipulation between United States Trustee and Marshack Hays LLP regarding first interim fee application filed by Marshack Hays LLP	.40
10/18/22	Document Copies re: letter re: settlement of labor invoices	.30
10/19/22	Document Copies re: compendium of orders re: motion for order to show cause re: civil contempt	15.90
11/14/22	Document Copies re: order directing Leroy E. Codding IV, in his individual capacity and as the manager of any other entity including Rabbit Ridge Wine Sales, Inc., to appear and show cause why he should not be held in contempt or why a referral to the department of justice for bankruptcy crime should not issue	.60
12/01/22	Document Copies re: Trustee's first set of requests for production of documents	2.80
12/01/22	Document Copies re: Trustee's first set of requests for admissions	1.80
12/01/22	Document Copies re: Trustee's first set of special interrogatories	1.60
12/08/22	Document Copies re: stipulation between Trustee and N. Rex Awalt Corp. DBA Aqua Engineering for allowance and payment of administrative claim	56.70
12/08/22	Document Copies re: notice of lodgment of order in bankruptcy case re: stipulation between Trustee and N. Rex Awalt Corp. DBA Aqua Engineering for allowance and payment of administrative claim	21.60
12/09/22	Document Copies re: notice of taking deposition of Lee Codding	1.20
12/09/22	Document Copies re: subpoena to testify at a deposition in a bankruptcy case to LeRoy E. Codding, IV	1.60
12/30/22	Document Copies re: notice of service of subpoena to custodian of records for coasthills credit union	8.40
12/30/22	Document Copies re: notice of service of subpoena to custodian of records for Wells Fargo Bank	9.00
12/30/22	Document Copies re: notice of taking deposition of Steven Jones	1.20
1/23/23	Document Copies re: notice of service of subpoena to custodian of records for Bank of America	7.00
2/23/23	Document Copies re: rate change notice	.40
3/16/23	Document Copies re: transmittal of witness fees to Azcuna Harvesting and Nevarez Farm Labor with checks	.80
3/17/23	Document Copies re: subpoena to Steven Jones	.80
3/20/23	Document Copies re: transmittal of witness fees to Steven Jones with check no 16479	.40
3/20/23	Document Copies re: subpoena to Steven Jones	1.00
4/11/23	Document Copies re: notice of motion and motion in limine to permit remote appearances of witnesses	2.40
4/12/23	Document Copies re: notice of motion and motion in limine to permit remote appearances of witnesses (judge copy)	1.10

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5/01/23	Document Copies re: unilateral pretrial (evidentiary hearing) stipulation, declaration of Tinho Mang, chapter 7 Trustee's trial brief re: evidentiary hearing (including judge copies)	44.40
6/02/23	Document Copies re: stipulation between chapter 7 Trustee and AgWest Farm Credit (including judge copy)	6.60
6/06/23	Document Copies re: chapter 7 Trustee's status report regarding ongoing civil contempt proceedings (including judge copy)	25.80
6/16/23	Document Copies re: notice of continued hearing re: ongoing civil contempt proceedings	1.50
6/29/23	Document Copies re: Trustee's status report regarding ongoing civil contempt proceedings (including judge copy)	18.60
7/28/23	Document Copies re: second stipulation between Trustee and Leroy Coddling (judge copy)	.60
7/28/23	Document Copies re: second stipulation between Trustee and Leroy Coddling	3.00
8/10/23	Document Copies re: notice of continued hearing re: ongoing civil contempt (including judge copy)	1.80
9/27/23	Document Copies re: notice of lodgment f order in bankruptcy case re: order to show cause re: civil contempt (including judge copy)	2.40
11/09/23	Document Copies re: motion to approve compromise with Somoco Labor Supply, Emerald Valley Labor, and Azcona Harvesting, notice of motion	53.00
11/15/23	Document Copies re: Trustee's status report regarding ongoing civil contempt proceedings (including judge copy)	2.70
12/04/23	Document Copies re: declaration that no party requested a hearing on motion	64.50
12/08/23	Document Copies re: notice of continued hearing re: ongoing civil contempt proceedings	.90
1/03/24	Document Copies Trustee's status report regarding ongoing civil contempt proceedings (judge copy included)	1.80
1/19/24	Document Copies re: Trustee's exigent status report regarding ongoing civil contempt proceedings	2.00
2/21/24	Document Copies re: notice of increased hourly rates charged by MHW	.40
2/21/24	Document Copies re: Trustee's status report regarding ongoing civil contempt proceedings (including judge copy)	9.30
2/23/24	Document Copies re: Trustee's courtesy submission of documents provided by Leroy E. Coddling IV and supplemental statements	3.00
3/01/24	Document Copies re: proof of service re: order for personal appearance of Leroy E. Coddling (including Judge copy)	2.50
3/19/24	Document Copies re: order re: further adjudication of civil contempt including bodily detention of Leroy E Coddling	3.50
3/20/24	Document Copies re: proof of service re: order re: further adjudication of civil contempt including bodily detention of Leroy E Coddling (judge copy)	.70
4/03/24	Document Copies re: Order re: further adjudication of civil contempt	2.10
4/03/24	Document Copies re: Proof of service for docket no. 467 re: order further adjudication of civil contempt (Judge copy)	.30
5/30/24	Document Copies re: Proof of service re: order setting continued status conference on contempt (including Judge copy)	3.20
9/09/24	Document Copies re: Trustee's status report regarding ongoing civil contempt proceedings (including Judge copy)	2.10
11/07/24	Document Copies re: Trustee's status report regarding ongoing civil contempt proceedings (including Judge copy)	2.40
11/08/24	Document Copies re: Proof of service for docket no. 485 re: order setting continued status conference on contempt (including Judge copy)	6.30
2/11/25	Document Copies re: Trustee's Status Report re: ongoing civil contemot proceedings	8.10



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2/20/25	Document Copies re: Notice of rate change	.40
<b>Sub-Total of Disbursements</b>		<b>\$ 453.40</b>

**E102 Outside Printing**

Date	Description	Amount
4/04/22	Outside copy service - Digicopy, Inc.	560.25
4/30/23	Outside copy service for five sets of trail exhibit binders, trail exhibit 1, Bankr.C.D.Cal._8-20-bk-13014_184 through exhibit 37, grape checks - Digicopy, Inc.	4,240.45
5/17/23	Outside copy service for notice of lodgment re: stipulation for civil contempt, signature version northern - stipulation re: civil contempt - Digicopy, Inc.	94.24
9/14/23	Outside copy service - Digicopy, Inc.	21.87
11/07/23	Outside copy service for Status Report Re: Civil Contempt 11-08-23 hearing - Digicopy, Inc.	12.41
<b>Sub-Total of Disbursements</b>		<b>\$ 4,929.22</b>

**E106 Online Research**

Date	Description	Amount
2/28/22	Computer Research re: LexisNexis usage, February 2022	26.37
3/31/22	Computer Research re: LexisNexis usage, March 2022	73.20
3/31/22	Computer Research re: Pacer usage, March 2022	.40
4/05/22	Computer Research re: Pacer usage, April 2022	.40
4/29/22	Computer Research re: LexisNexis usage, April 2022	46.61
5/23/22	Computer Research re: LexisNexis usage, May 2022	12.20
6/01/22	Computer Research re: LexisNexis usage, June 2022	17.49
7/08/22	Computer Research re: LexisNexis usage, July 2022	93.96
12/01/22	Computer Research re: LexisNexis usage, December 2022	85.05
12/31/22	Computer Research re: LexisNexis usage, December 2022	88.59
2/01/23	Computer Research re: LexisNexis usage, January 2023	38.35
4/01/23	Computer Research re: LexisNexis usage, March 2023	15.13
5/01/23	Computer Research re: LexisNexis usage, April 2023	38.35
5/01/23	Computer Research re: Pacer usage, April 2023	.70
7/01/23	Computer Research re: Pacer usage, June 2023	.40
10/01/23	Computer Research re: Pacer usage, September 2023	1.10
10/01/23	Computer Research re: LexisNexis usage, September 2023	68.27
12/01/23	Computer Research re: LexisNexis usage, November 2023	6.41
2/02/24	Computer Research re: Pacer usage, January 2024	.30
6/03/24	Computer Research re: LexisNexis usage, May 2024	26.84
<b>Sub-Total of Disbursements</b>		<b>\$ 640.12</b>

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**E107 Delivery Services/Messenger**

<b>Date</b>	<b>Description</b>	<b>Amount</b>
4/04/22	Deliver notice and application for issuance of an order to show cause re: civil contempt for will to United States Bankruptcy Court/Santa Ana, CA on 04/04/22	7.50
4/04/22	Travel to office	10.00
4/06/22	courtesy copies to Judge A. Smith at United States Bankruptcy Court/ Santa Ana, CA	7.50
7/11/22	Prepare and deliver document, Northern Holding LLC - served reply to order to show cause - Digicopy, Inc.	51.96
10/18/22	Courtesy copies of Trustee's reply to opposition filed by Leroy Coddling re: motion for issuance of order to Judge Clarkson/Santa Ana, CA on 10/18/22 - Nationwide Legal, Inc.	7.50
10/19/22	Courtesy copies of compendium of orders re: motion for order to show cause re: civil contempt to Judge Clarkson on 10/19/22 - Nationwide Legal, Inc.	7.50
12/23/22	Serve subpoena to testify at a deposition in a bankruptcy case or adversary proceeding on Steven Jones by end of the day on 12/29/22 - Nationwide Legal, Inc.	186.65
12/29/22	Serve subpoena to testify at a deposition in bankruptcy case or adversary proceeding to Steven Jones - Nationwide Legal, Inc.	228.00
12/30/22	Serve to subpoena to produce documents, information, or objects or to permit inspection of premise to Custodian of Records at Coasthills Credit Union/Santa Maria, CA - Nationwide Legal, Inc.	196.00
12/30/22	Serve to subpoena to produce documents, information, or objects or to permit inspection of premise to Custodian of Records at Wells Fargo Bank, N.A /Irvine, CA - Nationwide Legal, Inc.	144.50
1/23/23	Serve subpoena to produce documents, information, or objects or to permit inspection of premises to Custodian of Records at Bank of America/Irvine, CA - Nationwide Legal, Inc.	143.95
3/16/23	Federal Express to Nevarez Farm Labor/Paso Robles, CA on 03/16/23	25.22
3/16/23	Federal Express to Azcona Harvesting/Greenfield, CA on 03/16/23	18.86
3/20/23	Federal Express to Steven Lamar Jones/Valencia, CA on 03/20/23	11.38
4/26/23	Delivery and pick-up of documents from United States Bankruptcy Court/Santa Ana, CA - Nationwide Legal, Inc.	221.50
5/01/23	Courtesy copies of unilateral pretrial (evidentiary hearing) stipulation, declaration of Tinho Mang to Judge Clarkson/Santa Ana, CA - Nationwide Legal, Inc.	32.25
5/03/23	Courtesy copies of Documents 1352, 1353, 1354, 1355, Marshack v Remsen 23-01022 request for clerk to enter to Judge Clarkson/Santa Ana, CA - Nationwide Legal, Inc.	7.50
5/15/23	Courtesy copies of stipulation re: civil contempt, notice of lodgment of order to Judge Clarkson/Santa Ana, CA - Nationwide Legal, Inc.	7.50
6/02/23	Courtesy copies of stipulation between chapter 7 Trustee and AgWest Farm Credit FCLA to Judge Clarkson/Santa Ana, CA - Nationwide Legal, Inc.	25.25
6/06/23	Courtesy copies of Chapter 7 Trustee's status report re: ongoing civil contempt proceedings to Judge Clarkson/Santa Ana, CA - Nationwide Legal, Inc.	25.25
6/29/23	Courtesy copies of Trustee's status report re: ongoing civil contempt proceedings to Judge Clarkson/Santa Ana, CA - Nationwide Legal, Inc.	7.50
7/28/23	Courtesy copies of Second stipulation between chapter 7 Trustee and Leroy Coddling re: consent to adjudication to Judge Clarkson/Santa Ana, CA - Nationwide Legal, Inc.	25.25
8/10/23	Courtesy copies of notice of continued hearing re: ongoing civil contempt proceedings to Judge Clarkson/Santa Ana, CA - Nationwide Legal, Inc.	7.50
9/28/23	Courtesy copies of Notice of Lodgment of order in bankruptcy case re: order to show cause re: civil content to Judge Clarkson/Santa Ana, CA - Nationwide Legal, Inc.	7.50

MARSHACK HAYS WOOD LLP

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10/06/23	Pick-up attached documents from United States Bankruptcy Court/Santa Ana, CA and deliver to Marshack Hays Wood LLP/Irvine, CA - Nationwide Legal, Inc.	142.75
10/18/23	Courtesy copies of Notice of continued hearing re: ongoing civil contempt proceedings to Judge Clarkson/Santa Ana, CA - Nationwide Legal, Inc.	7.50
11/06/23	Courtesy copies of Trustee's status report re: ongoing civil contempt proceedings to Judge Clarkson/Santa Ana, CA - Nationwide Legal, Inc.	35.50
11/15/23	Courtesy copies of Trustee's status report re: ongoing civil contempt proceedings to Judge Clarkson/Santa Ana, CA - Nationwide Legal, Inc.	7.50
12/04/23	Courtesy copies of Declaration that no party requested a hearing on motion to Judge Clarkson/Santa Ana, CA - Nationwide Legal, Inc.	25.25
12/08/23	Courtesy copies of Notice of continued hearing re: ongoing civil contempt proceedings to Judge Clarkson/Santa Ana, CA - Nationwide Legal, Inc.	7.50
1/22/24	Courtesy copies of Trustee's exigent status report re: ongoing civil contempt proceedings to Judge Clarkson/Santa Ana, CA - Nationwide Legal, Inc.	3.75
2/21/24	Courtesy copies of Trustee's status report regarding ongoing civil contempt proceedings to Judge Clarkson/Santa Ana, CA - Nationwide Legal, Inc.	3.75
2/23/24	Courtesy copies of Chapter 7 Trustee's Courtesy Submission of documents provided by Leroy E. Coddington to Judge Clarkson/Santa Ana, CA - Nationwide Legal, Inc.	7.50
3/01/24	Courtesy copies of Proof of service re: order for personal appearance of Leroy E. Coddington to Judge Clarkson/Santa Ana, CA - Nationwide Legal, Inc.	7.50
3/20/24	Courtesy copies of Proof of service re: Order re: further adjudication of civil contempt to Judge Clarkson/Santa Ana, CA - Nationwide Legal, Inc.	25.25
3/20/24	Serve subpoena to appear and testify at a hearing or trial in bankruptcy case or adversary to Charles Schwab - Personal Most Knowledgeable/Glendale, CA - Nationwide Legal, Inc.	216.40
3/20/24	Serve letter, subpoena to appear and testify at a hearing or trial in bankruptcy case or adversary to Charles Schwab - Branch Manager/Irvine, CA - Nationwide Legal, Inc.	191.10
3/20/24	Federal Express to Lee Coddington/Tustin, CA on 03-20-24	12.17
3/20/24	Federal Express to Leroy Coddington/Paso Robles, CA on 03-20-24	18.93
4/03/24	Courtesy copies of Proof of service for Docket No. 467 re: Order further adjudication of civil contempt to Judge Clarkson/Santa Ana, CA - Nationwide Legal, Inc.	25.25
5/30/24	Courtesy copies of Proof of service re: order setting continued status conference on contempt to Judge Clarkson/Santa Ana, CA - Nationwide Legal, Inc.	7.50
9/09/24	Courtesy copies of Trustee's status report re: ongoing civil contempt proceedings to Judge Clarkson/Santa Ana, CA - Nationwide Legal, Inc.	7.50
11/08/24	Courtesy copies of Trustee's status report re: ongoing civil contempt proceedings to Judge Clarkson/Santa Ana, CA - Nationwide Legal, Inc.	25.00
11/08/24	Courtesy copies of Proof of service for docket no. 485 re: order setting continued status conference to Judge Clarkson/Santa Ana, CA - Nationwide Legal, Inc.	7.50
2/11/25	Courtesy copies of Trustee's Status Report re: on going Civil Contempt Proceedings to Judge Clarkson/Santa Ana, CA - Nationwide Legal, Inc.	25.00
<b>Sub-Total of Disbursements</b>		<b>\$ 2,223.62</b>

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**E108 Postage**

<b>Date</b>	<b>Description</b>	<b>Amount</b>
4/05/22	Postage re: stipulation re: extension of time for responsive pleading from Leroy Lee Coddling to motion for issuance of order to show cause re: civil contempt	.53
4/06/22	Postage re: Trustee's motion to authorize cash disbursements, notice of motion, supplemental zoom notice of hearing	13.89
4/14/22	Postage re: first interim fee application filed by Marshack Hays LLP, notice of application, supplemental zoom notice of hearing	16.08
4/19/22	Postage re: second stipulation re: extension of time for responsive pleading from Leroy Lee Coddling to motion for issuance of OSC re: civil contempt	.53
4/28/22	Postage re: stipulation between United States Trustee and Marshack Hays LLP regarding first interim fee application filed by Marshack Hays LLP	.53
10/18/22	Postage re: letter re: settlement of labor invoices	.57
10/19/22	Postage re: compendium of orders re: motion for order to show cause re: civil contempt	4.80
11/14/22	Postage re: order directing Leroy E. Coddling IV, in his individual capacity and as the manager of any other entity including Rabbit Ridge Wine Sales, Inc., to appear and show cause why he should not be held in contempt or why a referral to the department of justice for bankruptcy crime should not issue	1.14
12/01/22	Postage re: Trustee's first set of requests for production of documents, admissions, and special interrogatories	3.36
12/08/22	Postage re: stipulation and notice of lodgment of order in bankruptcy case between Trustee and N. Rex Awalt Corp. DBA Aqua Engineering for allowance and payment of administrative claim	23.61
12/09/22	Postage re: notice of taking deposition of Lee Coddling and subpoena to testify at a deposition in a bankruptcy case to LeRoy E. Coddling, IV	2.28
12/15/22	Postage RESENT MAIL re: stipulation between Trustee and N. Rex Awalt Corp DBA Aqua Engineering for allowance and payment of administrative claim and notice of lodgment	.81
12/30/22	Postage re: notice of service of subpoena to custodian of records for coasthills credit union and notice of service of subpoena to custodian of records for Wells Fargo Bank	10.08
12/30/22	Postage re: notice of taking deposition of Steven Jones	2.40
1/23/23	Postage re: notice of service of subpoena to custodian of records for Bank of America	8.40
2/23/23	Postage re: rate change notice	.60
3/17/23	Postage re: subpoena to Steven Jones	1.20
3/20/23	Postage re: subpoena to Steven Jones	1.20
4/11/23	Postage re: notice of motion and motion in limine to permit remote appearances of witnesses	1.68
5/01/23	Postage re: unilateral pretrial (evidentiary hearing) stipulation, declaration of Tinho Mang, chapter 7 Trustee's trial brief re: evidentiary hearing	4.96
6/02/23	Postage re: stipulation between chapter 7 Trustee and AgWest Farm Credit	4.20
6/06/23	Postage re: chapter 7 Trustee's status report regarding ongoing civil contempt proceedings	9.90
6/16/23	Postage re: notice of continued hearing re: ongoing civil contempt proceedings	3.00
6/29/23	Postage re: Trustee's status report regarding ongoing civil contempt proceedings	8.70
7/28/23	Postage re: second stipulation between Trustee and Leroy Coddling	3.15
8/10/23	Postage re: notice of continued hearing re: ongoing civil contempt	3.15
9/27/23	Postage re: notice of lodgment f order in bankruptcy case re: order to show cause re: civil contempt	1.26
11/09/23	Postage re: motion to approve compromise with Somoco Labor Supply, Emerald Valley Labor, and Azcona Harvesting, notice of motion	29.49

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11/15/23	Postage re: Trustee's status report regarding ongoing civil contempt proceedings	1.26
12/04/23	Postage re: declaration that no party requested a hearing on motion	15.96
12/08/23	Postage re: notice of continued hearing re: ongoing civil contempt proceedings	1.26
1/03/24	Postage Trustee's status report regarding ongoing civil contempt proceedings	1.26
1/19/24	Postage re: Trustee's exigent status report regarding ongoing civil contempt proceedings	1.74
2/21/24	Postage re: notice of increased hourly rates charged by MHW	.64
2/21/24	Postage re: Trustee's status report regarding ongoing civil contempt proceedings	4.22
2/23/24	Document Copies re: Trustee's courtesy submission of documents provided by Leroy E. Codding IV and supplemental statements	1.28
3/01/24	Postage re: proof of service re: order for personal appearance of Leroy E. Codding	2.56
3/19/24	Postage re: order re: further adjudication of civil contempt including bodily detention of Leroy E Codding (sent USPS priority mail)	8.50
4/03/24	Postage re: Order re: further adjudication of civil contempt	1.92
5/30/24	Postage re: Proof of service re: order setting continued status conference on contempt	1.92
9/09/24	Postage re: Trustee's status report regarding ongoing civil contempt proceedings	1.38
11/07/24	Postage re: Trustee's status report regarding ongoing civil contempt proceedings	1.38
11/08/24	Postage re: Proof of service for docket no. 485 re: order setting continued status conference on contempt	5.52
2/11/25	Postage re: TRUSTEE'S STATUS REPORT REGARDING ONGOING CIVIL CONTEMPT PROCEEDINGS	5.52
2/20/25	Postage re: Notice of rate change	.69
<b>Sub-Total of Disbursements</b>		<b>\$ 218.51</b>

**E109 Local Travel**

Date	Description	Amount
5/30/23	Travel to attend order to show cause hearing on 05/11/23	10.56
5/12/24	Travel to hearing	15.39
<b>Sub-Total of Disbursements</b>		<b>\$ 25.95</b>

**E112 Court Fees**

Date	Description	Amount
3/04/22	Obtain certified copy of sale order and certified copy of findings of fact and conclusions of law from United States Bankruptcy Court	22.00
<b>Sub-Total of Disbursements</b>		<b>\$ 22.00</b>

**E114 Witness Fees**

Date	Description	Amount
3/16/23	Nevarez Farm Labor, Witness Fees-Subpoena to Appear	40.00
3/16/23	Azcona Harvesting, Witness Fees-Subpoena to Appear	40.00
3/16/23	Nevarez Farm Labor, Witness Fees-Subpoena to Appear Void Check # - 000016478	-40.00
3/20/23	Steven Jones, Witness Fees	40.00
<b>Sub-Total of Disbursements</b>		<b>\$ 80.00</b>

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**E115 Deposition Transcripts**

Date	Description	Amount
4/04/22	transcription of Examination Under Oath: Northern Holding, LLC	378.30
<b>Sub-Total of Disbursements</b>		<b>\$ 378.30</b>

**E116 Trial Transcripts**

Date	Description	Amount
12/01/22	Transcript for hearing taken on 10/26/22 - Ben Hyatt	351.00
2/15/23	Obtain one copy of certified transcripts of Steven Jones - The Sullivan Group of Court Reporters	970.50
<b>Sub-Total of Disbursements</b>		<b>\$ 1,321.50</b>

**E123 Other Professionals**

Date	Description	Amount
4/04/22	2" ACCO Bind of each	27.50
4/04/22	Sales tax	46.33
<b>Sub-Total of Disbursements</b>		<b>\$ 73.83</b>

**E124 Other**

Date	Description	Amount
2/10/23	Outside services for transcription of hearing held on 07/13/21 - eScribers, LLC	474.50
3/20/23	Response to subpoena regarding Northern Holding documents requested - Bank of America	27.60
<b>Sub-Total of Disbursements</b>		<b>\$ 502.10</b>

**CURRENT DISBURSEMENTS \$ 10,868.55**

**EXHIBIT 6**

MARSHACK HAYS WOOD LLP

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**DISBURSEMENT RECAP BY TASK CODE**

<b>Task</b>	<b>Description</b>	<b>Amount</b>
E101	Copying	453.40
E102	Outside Printing	4,929.22
E106	Online Research	640.12
E107	Delivery Services/Messenger	2,223.62
E108	Postage	218.51
E109	Local Travel	25.95
E112	Court Fees	22.00
E114	Witness Fees	80.00
E115	Deposition Transcripts	378.30
E116	Trial Transcripts	1,321.50
E123	Other Professionals	73.83
E124	Other	502.10
	Sub-Total of Disbursements	\$ 10,868.55

**TOTAL CURRENT CHARGES**

**\$ 138,414.55**



**EXHIBIT 7**

## **PARTNERS**

### **RICHARD A. MARSHACK**

Richard A. Marshack is a founding member of the firm of Marshack Hays Wood LLP. He was born in Las Vegas, Nevada, June 21, 1958. He graduated from University of California at Irvine in 1979 with a Bachelor of Arts degree and California Western School of Law (J.D. Magna Cum Laude, 1982). Recipient, American Jurisprudence Award: Agency and Partnership. Staff Writer, 1980-1981 and Lead Articles Editor, 1981-1982 California Western Law Review. He was admitted to the California Bar in 1982 and the U. S. District Court, Central and Southern Districts of California and U. S. Court of Appeals, Ninth Circuit, 1984.

Mr. Marshack was Law Clerk to the Honorable Folger Johnson, Chief Judge, United States Bankruptcy Court, District of Oregon, 1982-1984, and an Adjunct Professor: Bankruptcy Law, Western States University College of Law, Bankruptcy Law, 1993; Bankruptcy Law, University of California, Irvine, 1985-1992.

Mr. Marshack has authored several articles, including: "The Toxic Claim: Using Bankruptcy Law to Limit Environmental Liabilities," California Bankruptcy Journal, Volume 19, Number 3, 1991; "Recent Developments Under Section 546 of the Bankruptcy Code," Tactics for Unsecured Creditors of Bankrupt Debtors," California Lawyer 21, August, 1984; "Adequate Protection for the Unsecured Creditor Under the Bankruptcy Code", Commercial Law Journal 621, December 1983; "Recent Developments for Reclaiming Goods Under the Bankruptcy Code and the Uniform Commercial Code, "Uniform Commercial Code Law Journal 187, July, 1983; "Reclamation of Goods Under the Bankruptcy Code," Oregon Debtor-Creditor News Letter, I, July 1983; "*Sindell vs. Abbot Laboratories*: Is Market Share Liability the Best Remedy to the DES Controversy" California Western Law Review 143, 1981.

Memberships: Orange County Bankruptcy Forum, Director and President 1995-96; Orange County Bar Association (Commercial Law & Bankruptcy Section), Chairman, 1989; California State Bar Association; Commercial Law League of America; Los Angeles Bankruptcy Forum.

*Panel Bankruptcy Trustee for U.S. Bankruptcy Court, Central District of California, 1985 - Present.*

### **D. EDWARD HAYS**

D. Edward Hays is a founding member of the firm of Marshack Hays LLP. He graduated with honors from California State University at Fullerton in 1989 with a Bachelor of Arts degree in Business. He graduated from the University of Southern California Law Center in 1992 where he was a member of the Hale Moot Court Honors program. Mr. Hays was admitted to practice in 1992. Ed has been certified as a bankruptcy law specialist by the State Bar of California.

Ed focuses his practice on bankruptcy and litigation matters. In 2020, he was the President of the California Bankruptcy Forum. In 2000 and 2017, he served as Chair of the Commercial Law & Bankruptcy Section of the Orange County Bar Association. He also has served as a Director or

member of the following organizations: the Inland Empire Bankruptcy Forum; the Orange County Bankruptcy Forum; the William P. Gray Legion Lex American Inns of Court, the Federal Bar Association, and the Executive Council for the College of Business at Cal State Fullerton. In 1998 and 1999, Mr. Hays also served as a Judge Pro Tem for the Superior Court of the State of California, County of Los Angeles. Ed has been selected on numerous occasions to present continuing education lectures on various legal topics including bankruptcy, litigation, exemptions, and legal research. He has spoken at the National Conference of Bankruptcy Judges, the National Association of Bankruptcy Trustees, the National Association of Consumer Bankruptcy Attorneys, the California Bankruptcy Forum, the Orange County Bankruptcy Forum, the Inland Empire Bankruptcy Forum, the Orange County Bar Association, and the Office of the United States Trustee for multiple Regions. He also served on the Central District Task Force for Amendments to the Local Bankruptcy Rules.

Ed's published cases include:

*In re Brace*, 9 Cal.5th 903 (Cal. Supreme Court 2020)  
*Richards v. Marshack (In re Richards)*, 644 B.R. 544 (Distr. C.D.Cal. 2022)  
*Legal Serv. Bureau, Inc. v. Orange Cnty. Bail Bonds, Inc. (In re Orange Cnty. Bail Bonds, Inc.)*, 638 B.R. 137 (9<sup>th</sup> Cir. BAP 2022)  
*In re Eagan Avenatti, LLP*, 637 B.R. 502 (Bankr. C.D.Cal. 2022)  
*Patow v. Marshack (In re Patow)*, 632 B.R. 195 (9<sup>th</sup> Cir. BAP 2021)  
*In re Brace*, 979 F.3d 1228 (9<sup>th</sup> Cir. 2020)  
*In re Nolan*, 618 B.R. 860 (Bankr. C.D.Cal. 2020)  
*Jue v. Liu (In re Liu)*, 611 B.R. 864 (9<sup>th</sup> Cir. BAP 2020)  
*Naylor v. Farrell (In re Farrell)*, 610 B.R. 317 (Bankr. C.D.Cal. 2019)  
*In re Roger*, 393 F.Supp.3d 940 (Distr. Cal. 2019)  
*Brace v. Speier*, 908 F.3d 531 (9<sup>th</sup> Cor. 2018)  
*Slaieh v. Simons*, 548 B.R. 28 (Distr. Cal. 2018)  
*Cal. Corr. Peace Officers Ass'n Ben. Trust Fund v. Corbett (In re Corbett)*, 2017 U.S.Dist. Lexis 108925 (E.D. Cal. 2017)  
*Brace v. Speier (In re Brace)*, 566 B.R. 13 (9<sup>th</sup> Cir. BAP 2017)  
*In re DRI Cos. v. Sunwize Techs. Inc. (In re DRI Cos.)*, 552 B.R. 195 (Bankr. C.D.Cal. 2016)  
*Stahl v. Whelan Elec., Inc. (In re Modtech Holdings)*, 503 B.R. 737 (Bankr. C.D.Cal. 2013)  
*In re Cusimano*, 2013 WL 9736597 (Bankr. C.D.Cal. 2013)  
*In re Cass*, 476 B.R. 602 (Bankr. C.D.Cal. 2012)  
*In re Four Star Financial Services, Inc.*, 444 B.R. 428 (Bankr. C.D.Cal. 2011) rev'd 469 B.R. 30 (D.Cal. 2012)  
*In re Rinard*, 415 B.R. 12 (Bankr. C.D.Cal. 2011)  
*In re Dick Cepek*, 339 B.R. 730 (9<sup>th</sup> Cir. BAP 2006)  
*In re Dudley*, 249 F.3d 1170 (9<sup>th</sup> Cir. 2001)  
*In re Kim*, 257 B.R. 680 (9<sup>th</sup> Cir. BAP 2000)  
*In re Kuraishi*, 237 B.R. 172 (Bankr. C.D.Cal. 1999)  
*Blonder v. Cumberland Engineering, (1999)* 71 Cal.App.4th 1057, 84 Cal.Rptr.2d 216  
*In re Metz*, 225 B.R. 173 (9<sup>th</sup> Cir. BAP 1998)  
*In re National Environmental Waste Corporation*, 191 B.R. 832 (Bankr. C.D.Cal. 1996) aff'd 129 F.3d 1052 (9<sup>th</sup> Cir. 1997)  
*In re Turner*, 186 B.R. 108 (9<sup>th</sup> Cir. BAP 1995)

*In re Continental Capital & Credit*, 158 B.R. 828 (Bankr. C.D.Cal. 1993)

Ed and his wife, Sarah Cate Hays, have also co-authored the following law review articles published in the California Bankruptcy Journal:

- *The Client Without a Remedy and the Windfall Estate – The Case for Debtor Ownership of Malpractice Claims Against Bankruptcy Counsel* (32 Cal. Bank. J. 65 (2012));
- *The Same Love – Marriage Equality in Bankruptcy Post-DOMA and the Evolving Rights of Registered Domestic Partners* (33 Cal. Bank. J. 49 (2014)); and
- *Good Help Is Hard to Fund: The Problem of Earned Upon Receipt Retainers and Pre-Funded Litigation in Bankruptcy* (33 Cal. Bankr. J. 421 (2016)).

#### **DAVID A. WOOD**

David A. Wood focuses his practice areas include bankruptcy litigation, business and civil litigation, lender liability, and creditors' rights.

Mr. Wood earned his Bachelor of Arts degree from Biola University in 2003, where he graduated magna cum laude. Thereafter, Mr. Wood was a senior associate at Alfred Gobar Associates, a firm specializing in developing econometric modeling systems to evaluate land development opportunities, and the existence of economic blight. He earned his law degree from Chapman University School of Law in 2010, where he graduated in the top 6% of his class. Prior to joining Marshack Hays Wood, Mr. Wood served a two-and-a-half year term as the judicial law clerk to the Honorable Erithe A. Smith of the United States Bankruptcy Court for the Central District of California, Santa Ana Division. Mr. Wood also externed for Honorable Theodor C. Albert of the United States Bankruptcy Court for the Central District of California, Santa Ana Division.

While in law school, Mr. Wood was a symposium editor for the Chapman Law Review and the recipient of the CALI Excellence Award for Immigration Law and Select Topics in American Law.

**LAILA MASUD** focuses her practice in bankruptcy and business litigation, including lender liability and creditors' rights.

Ms. Masud graduated cum laude from the University of California, Irvine in 2012. She earned her law degree from Pepperdine University School of Law in 2016. She was admitted to practice law in California in 2016. Prior to joining Marshack Hays Wood, Ms. Masud served as a judicial law clerk to the Honorable Thomas B. Donovan at the United States Bankruptcy Court for the Central District of California, Los Angeles Division.

During law school, as an extern for the Honorable Vincent P. Zurzolo at the United States Bankruptcy Court for the Central District of California, Los Angeles Division, she served on the Rules Committee where she conducted research and wrote on various issues of bankruptcy law, including local court forms, rules and procedures. She also served as a student leader and was nominated for The Parris Institute for Professional Formation Award for Excellence in Leadership and Excellence in Peacemaking. In 2020, Ms. Masud served as the youngest President of the OCBA's Commercial Law and Bankruptcy Section. Ms. Masud is also a member of the International Women's Insolvency & Restructuring Confederation and in August 2020 Ms. Masud

was profiled in the Orange County Business Journal for Women in Law. Ms. Masud is conversant in Spanish, Urdu and Hindi.

## **ATTORNEYS**

**KRISTINE A. THAGARD** focuses her practice on contract, construction, loan enforcement (including lender's right to insurance proceeds and guarantees), purchase and sale transactions, partnership dispute, toxic cleanup and environmental contamination, broker malfeasance, fiduciary duty (broker/agent, partnership and trust), and insurance (negotiation, bad faith, and declaratory relief). She has significant litigation experience in multi-party complex construction defect actions, all aspects of general/commercial liability defense (construction, product and premise liability), subrogation, and real estate (broker/agent, contract, title, contract and fraud).

Ms. Thagard was born in Lynwood, California and graduated cum laude from Menlo College where she served on the Board of Trustees for 9 years. She received her J.D. from the University of Southern California in 1980. While in law school she served as a judicial extern to the Honorable Robert Kingsly, Second Appellate District Court of Appeal. She is admitted to practice in both California (1980) and Nevada (2001) as well as the Federal Courts of both states. She also holds a California Real Estate Broker's License.

**MATTHEW W. GRIMSHAW** focuses his practice on insolvency law and litigation. He represents parties in all aspects of bankruptcy matters and out-of-court restructurings. He also has significant experience litigating and advising clients on issues resulting from the debtor-creditor relationship, including the enforcement of notes and guarantees, writs of attachment, receiverships, wrongful foreclosures, mortgage elimination scams, and injunctions.

Mr. Grimshaw was born in Mesa, Arizona. He graduated from Brigham Young University with a Bachelor of Arts degree in Economics. He graduated with honors from Willamette University College of Law, where he served as the editor-in-chief of the school's Journal of International Law and Dispute Resolution. Mr. Grimshaw was admitted to practice law in California in 2000.

Mr. Grimshaw served a two-year term as a judicial law clerk to the Honorable John E. Ryan. During his first year, Mr. Grimshaw served as Judge Ryan's trial law clerk. During his second year, when Judge Ryan was the chief judge of the Bankruptcy Appellate Panel of the Ninth Circuit Court of Appeals, Mr. Grimshaw served as his appellate law clerk.

Mr. Grimshaw has been asked on many occasions to present lectures on various subjects, including bankruptcy, creditors' rights, and legal ethics. He has published numerous articles on bankruptcy-related topics. In 2006, he was also appointed by Ninth Circuit Court of Appeals to serve on the committee that evaluated candidates and made recommendations as to who should fill existing vacancies on the United States Bankruptcy Court for the Central District of California.

Mr. Grimshaw is a long-time member of the Board of Directors for the Orange County Bankruptcy Forum. He also served as Chair of the Commercial Law and Bankruptcy Section of the Orange County Bar Association.

**CHAD V. HAES**

Chad V. Haes focuses his practice areas include bankruptcy litigation, business and civil litigation, lender liability, and creditors' rights. Mr. Haes' litigation experience includes representing institutional lenders in actions related to lien priority and wrongful foreclosure, prosecuting and enforcing mechanic's liens, seeking unlawful detainer judgments on behalf of secured lenders and representing creditors, debtors and trustees in the bankruptcy context.

Mr. Haes is a California native who earned his Bachelor of Arts degree from Azusa Pacific University in 2004 and his law degree from Southwestern Law School in 2008. Prior to joining Marshack Hays Wood, Mr. Haes served a two-year term as the judicial law clerk to the Honorable Meredith A. Jury of the United States Bankruptcy Court for the Central District of California, Riverside Division. Mr. Haes also externed for Honorable Samuel L. Bufford of the United States Bankruptcy Court for the Central District of California, Los Angeles Division.

While in law school, Mr. Haes was a member of the Moot Court Honors Program and the recipient of the John J. Schumacher full-tuition scholarship, the Equal Justice America fellowship, the Wiley W. Manuel Award for Pro Bono Legal Services and the CALI Excellence Award for Constitutional Law. Mr. Haes was also selected as a finalist oralist and finalist writer in the Southwestern First-Year Intramural Moot Court Competition and a finalist oralist in the Rendigs National Products Liability Moot Court Competition.

**ALINA MAMLYUK** is Of Counsel to Marshack Hays Wood, LLP, a bankruptcy law firm serving Southern California located in Irvine, California. Prior to joining the firm, Ms. Mamlyuk represented clients in copyright matters in her own practice, working on traditional/new media and entertainment cases. Specifically, Ms. Mamlyuk focused on helping creative professionals build extensive intellectual property portfolios that they could then successfully license, sell or otherwise exploit to the full extent of the U.S. Copyright Law. Her client roster includes renowned YouTubers, Instagram influencers, Tik-Tokers, award-winning creative and art directors as well as employees at top advertising agencies and tech giants (Meta, Amazon).

**AARON E. DE LEEST** is a bankruptcy attorney and litigator with more than 20 years of experience. Aaron represents debtors, creditors, and trustees in bankruptcy matters, litigation, and appeals. He routinely represents debtors and creditors in Chapter 11 reorganization cases. Aaron also provides guidance to creditors regarding their claims outside of bankruptcy, including collection actions and pre- and post-judgment remedies. He also represents receivers in both federal and state courts.

Aaron is a current advisor and former Chair of the Insolvency Law Committee, Business Law Section of the California Lawyer's Association and has served as the Chair of the Publications Subcommittee for the Insolvency Law Committee. Aaron is a former Chair for the Bankruptcy Committee of the Los Angeles County Bar Association, Commercial Law and Bankruptcy Section and a former Chair of the Beverly Hills Bar Association, Bankruptcy Section.

In addition, Aaron has been selected by his peers as a "Super Lawyer" in the Super Lawyers Magazine. Aaron is also a former judicial extern to the Honorable Barry Russell, United States Bankruptcy Judge, and is a recipient of the Barry Russell Federal Bar Association Award for

Excellence in the Field of Federal Practice. Aaron is also a recipient of the American Bankruptcy Institute Medal of Excellence.

**TINHO MANG** is a senior associate attorney at Marshack Hays. He has been with the firm since 2018. Mr. Mang has represented trustees (Chapter 7 and 11), creditors (secured and unsecured), debtors, and avoidance action defendants in cases primarily located in the Central District of California.

Mr. Mang graduated *magna cum laude* from UCLA with a major in Scandinavian language and culture, and then switched sides to earn his Juris Doctorate at USC, where he served as the Executive Senior Editor of the Southern California Review of Law and Social Justice. During law school, Mr. Mang discovered his interest in practicing bankruptcy law in the course of two summer externships with the Honorable Scott C. Clarkson, United States Bankruptcy Judge.

Mr. Mang served as the lead attorney in dozens of bankruptcy adversary matters, including two bench trials, prevailing on behalf of the trustee in both trials. He also has represented parties in dozens of bankruptcy appeals, including appeals in the United States District Court, Ninth Circuit Bankruptcy Appellate Panel, and Ninth Circuit Court of Appeals. Mr. Mang's representative work includes the following results:

- Sale of a \$9.1 million winery estate in Paso Robles
- Sale of a \$6.25 million beachfront property in Dana Point
- Settlement of disputed lien claims over \$2.5 million in investment funds leading to seven-figure recovery for bankruptcy estate
- Sale of a \$2.2 million ocean view property Newport Beach
- Sale of a \$2.1 million vacant lot in Beverly Hills
- Sale of a \$1.35 million property in Santa Ana
- Sale of a \$1.1 million former sober living facility in San Juan Capistrano
- Sale of a \$1.06 million property in Murrieta requiring a driveway access easement
- Liquidation of assets of a heavy construction and earthwork company
- Recovery of compensatory monetary sanctions award (including sanctions for frivolous appeal) in a debtor-initiated violation of the automatic stay
- Recovery of compensatory and punitive damages for a creditor's violation of the discharge injunction
- Recovery of funds from retirement accounts claimed as exempt through successful exemption objections or settlement
- Liquidation of franchising assets in nationwide men's salon chain
- Recovery of six-figure settlement in lawsuit for wrongful stop payment of a cashier's check

Mr. Mang will serve a three-year term on the board of directors for the Inland Empire Bankruptcy Forum beginning in 2023. Mr. Mang also volunteers to provide *pro bono* services on a monthly basis with Public Counsel.

**BRADFORD N. BARNHARDT** is an associate attorney at Marshack Hays Wood. Before joining the firm, he completed a two-year judicial law clerkship for the Honorable Sandra R. Klein at the

U.S. Bankruptcy Court in Los Angeles. Brad graduated with honors and in the top 10% of his class from Emory University School of Law and served as a Notes & Comments Editor for the Emory Bankruptcy Developments Journal. He received a Bachelor of Arts, summa cum laude, in English and mathematics from the University of Missouri and was elected to Phi Beta Kappa during his junior year.

**SARAH HASSELBERGER** is an associate attorney at Marshack Hays Wood. Before joining the firm, she served as a judicial law clerk for the Honorable Scott H. Yun at the U.S. Bankruptcy Court for the Central District of California. Sarah received a merit scholarship and graduated in the top 7% of her class from Chapman University Dale E. Fowler School of Law. During law school, Sarah worked as a law clerk for Marshack Hays Wood and served as a judicial extern for the Honorable Scott H. Yun and the Honorable Theodor C. Albert in the U. S. Bankruptcy Court for the Central District of California. Sarah received her Bachelor of Science, cum laude, in Arts Administration from Wagner College in Staten Island, New York.

**DEVAN DE LOS REYES** is an associate at Marshack Hays Wood. Before joining the firm, she served as a judicial law clerk to the Honorable Mary P. Gorman at the Bankruptcy Court for the Central District of Illinois. Devan graduated from the University of Illinois College of Law. She was admitted to practice law in Illinois in 2021. While in law school, she served as the Managing Editor of the Elder Law Journal, on the executive board of the Women's Law Society, and as a teaching assistant for Legal Writing and Analysis.

Devan received her B.A. in Psychology and Sociology from the University of California, Santa Barbara.

#### **PARALEGALS AND TRUSTEE ADMINISTRATORS**

**PAMELA KRAUS**, Trustee Case Administrator and Paralegal 1990 to Present; Education: Coastline Community College, Costa Mesa (A.A. 2004); Legal Assistant Training Program, Coastline Community College, American Bar Association Certification (Completion 2004). Member: Orange County Paralegal Association; Orange County Bankruptcy Forum; National Association of Bankruptcy Trustees.

**CHANEL MENDOZA**, Experience: Ms. Mendoza is a seasoned litigation and bankruptcy Legal Assistant/Paralegal. She has more than twenty years of law related experience of workers' compensation, personal injury, business litigation, employment law, and bankruptcy, all while working under the direct supervision of active members of the California State Bar. Ms. Mendoza has also worked fourteen of those years under the direction and supervision of Marshack Hays Wood LLP's founding partner, D. Edward Hays. Ms. Mendoza has federal and state court experience, including extensive trial and appellate knowledge. Ms. Mendoza is a former Board Member of NALS and is a current member of the National Notary Association and Orange County Legal Secretaries Association, Inc.

**LAYLA BUCHANAN**, Experience: Ms. Buchanan is a Senior Paralegal with Marshack Hays Wood LLP and has over twenty years of law related experience. Ms. Buchanan has worked extensively in civil, bankruptcy and family law, working under the direct supervision of active members of the California State Bar. Ms. Buchanan obtained her Paralegal Certificate from



Coastline Community College's ABA accredited program. Member: Orange County Legal Secretaries Association, and Orange County Paralegal Association. Ms. Buchanan has extensive knowledge in all aspects of state and federal court litigation and bankruptcy practices..

**CYNTHIA BASTIDA**, Experience: Ms. Bastida has over twenty years of experience working as a Legal Assistant/Paralegal. She has her Paralegal Certificate (completion in 1991) and earned a Bachelor of Arts in Psychology from California State University Fullerton in 2004. She has a wide range of experience from civil litigation, bankruptcy, product liability, lemon law, real estate and corporate law as well as eminent domain. Her skills include: Legal research, trial preparation along with drafting numerous fee applications, petitions, proofs of claim, notices, motions and discovery. Cynthia is a member of Orange County Legal Secretary Association (OCLSA) and National Association for Legal Support Professionals (NALS).

**SANDRA PINEDA**, Experience: Ms. Pineda has more than thirty years of legal experience providing comprehensive support to business litigation, M&A, real estate, employment litigation and bankruptcy teams, all while working under the direct supervision of active members of the California State Bar. Sandra has also worked three of those years under the direction and supervision of Marshack Hays Wood LLP's founding partner, D. Edward Hays. Ms. Pineda has federal and state court experience. Ms. Pineda is a current member of NALA.

#### Billing Rates:

Partners	Rates	Of Counsel	Rates	Paralegals	Rates
Richard A. Marshack	\$770	Kristine A. Thagard	\$670	Pamela Kraus	\$380
D. Edward Hays	\$770	Matthew W. Grimshaw	\$670	Chanel Mendoza	\$380
David A. Wood	\$670	Chad V. Haes	\$670	Layla Buchanan	\$380
Laila Masud	\$590	Alina Mamlyuk	\$570	Cynthia Bastida	\$380
				Sandra Pineda	\$380
				Chantal Arnold	\$350
Senior Counsel	Rates	Associates	Rates		
Aaron E. de Leest	\$670	Tinho Mang	\$570		
		Bradford N. Barnhardt	\$470		
		Sarah R. Hasselberger	\$470		
		Devan de los Reyes	\$400		

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
870 Roosevelt, Irvine, CA 92620

A true and correct copy of the foregoing document entitled: **SECOND APPLICATION FOR ALLOWANCE OF FEES AND COSTS ON A FINAL BASIS FILED BY MARSHACK HAYS WOOD LLP AS GENERAL COUNSEL FOR TRUSTEE; MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATION OF TINHO MANG IN SUPPORT** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **March 20, 2025**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☐ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:** On **March 20, 2025**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

DEBTOR NORTHERN HOLDING, LLC ATTN: OFFICER, A MANAGING OR GENERAL AGENT, OR TO ANY OTHER AGENT AUTHORIZED BY APPOINTMENT OR LAW TO RECEIVE SERVICE 13217 JAMBOREE RD #429 TUSTIN, CA 92782	
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☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL:** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **March 20, 2025**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

<b>VIA PERSONAL DELIVERY</b> <b>PRESIDING JUDGE'S COPY</b> HONORABLE SCOTT C. CLARKSON UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA RONALD REAGAN FEDERAL BUILDING AND COURTHOUSE 411 WEST FOURTH STREET, SUITE 5130 SANTA ANA, CA 92701-4593	
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☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

March 20, 2025  
Date

Layla Buchanan  
Printed Name

/s/ Layla Buchanan  
Signature